PubCLEAR Guide
HCA Healthcare Graduate Medical Education

A Guide to the Publication Clearance Process for HCA Healthcare GME
Introduction to PubCLEAR

What PubCLEAR is…
PubCLEAR is a process used to approve HCA Healthcare publications for external dissemination. This includes submissions to peer-reviewed journals, professional society journals and/or blogs, poster presentations, live or recorded presentations, and any public dissemination of HCA Healthcare data. **You must receive PubCLEAR approval before releasing any information outside of HCA Healthcare.**

What PubCLEAR isn’t…
- Permission to do research
- A peer review of your product
- An endorsement of your product’s results
- A retroactive approval of products already released
- An approval process for products presented for internal purposes only.

How long does clearance take?
Initial review can take up to 30 days. Time to final approval is NOT guaranteed.
Getting started

Go to [https://scholarlycommons.hcahealthcare.com/](https://scholarlycommons.hcahealthcare.com/) Click on My Account.
Create New Account

Login
Email address:

Password:

☐ Remember me

Login

Create new account
You will need to create an account to complete your request. It's fast and free.

Sign up

• Click “Sign Up” to create a new account.

New Email Address? Please log in and choose Edit Profile on your My Account page to update your contact information or customize your password.
Create New Account (cont.)

Please complete this form to create your user account. Use proper casing for names and institution as these fields may be displayed for publication purposes. We do not sell nor rent contact information to third parties.

Password requirements:
- at least 8 characters
- at least 1 upper case letter
- at least 1 lower case letter
- at least 1 number
- at least 1 special character (e.g., !@#)

You will receive an email confirmation shortly.

Required fields are marked with an *.

Email address *
First/Given Name *
Middle Initial
Last/Family Name *
Suffix
Institutional Affiliation: Not on list? Please enter name in full.

Password *
Re-enter Password *

Sign up

NOTE: Use your HCA Healthcare affiliated email address when creating your account. Any personal email address or non-HCA Healthcare affiliated email address (i.e., a .edu address) is prohibited.
How to Submit

Two ways to submit:
1. GME Publication Clearance hyperlink in the center of the page
2. Submit to PubCLEAR on sidebar
Submission Agreement

Before you begin...

- You must complete a submission agreement. Read this carefully before agreeing to the terms on the page.
- This also provides instructions on how to complete the process.
Submission Form

Consent Form Requirement for Case Reports

Effective immediately, all document types that contain case reports require a patient consent form. This applies to documents with and without images. Please use the “Consent and Authorization to Release Information” document to meet the patient consent requirement.

Please select one of the following statements:

- I understand, but this does not apply to me as my document does not include a case report.
- I am submitting a document containing a case report and I will comply with the patient consent requirement.

Title

Please use Headline Style Capitalization e.g., The Scholarly Communication Crisis

Enter title:
My Full Document Title

Authors

Add your DRD as last author. This is not for true authorship purposes; Research Directors need to stay in the loop about products in their divisions.

Institution

All authors with HCA Healthcare affiliation will use HCA Healthcare as their institution.

Adding authors

You can either search for an author or enter their information manually as seen with author number two.
Submission Form Continued

**Division**
Choose the division of the submitting author. Only HCA Healthcare affiliated authors can submit to PubCLEAR.

**Hospital**
Choose the hospital of the submitting author.

**Relationship to Facility**
What is the submitting author’s relationship to the institution?

**Document Types**
Choose the document type that most closely fits your scholarly product.

If this is a case report, was patient seen at a non-HCA Healthcare facility?
- Yes
- No
- Not a Case Report

**Research Project ID**
Enter the Project ID received after DATACLEAR submission. It will be the DATACLEAR submission number.

**Release Date**
When do you anticipate sending this product to an external entity?
Submission Form Continued

**Anticipated Release Entity**

Examples of a release entity may include the title of a journal or a conference to which this research will be submitted.

**Disciplines**

Please indicate the academic discipline(s) that best describes your submission. Click [here](#) to view the complete list of disciplines.

**Available:**
- Architecture
- Arts and Humanities
- Business
- Education
- Engineering
- Law
- Life Sciences
- Medicine and Health Sciences
- Physical Sciences and Mathematics
- Social and Behavioral Sciences

**Selected:**
- Medical Specialties
  - Allergy and Immunology
  - Anesthesiology
  - Behavioral Medicine
  - Cardiology
  - Critical Care
  - Dermatology
  - Emergency Medicine
  - Endocrinology, Diabetes, and Metabolism

**Disciplines**

Choose your program discipline and any other relevant topic areas. Disciplines most useful to HCA Healthcare authors will be under “Medicine and Health Sciences”, then under “Medical Specialties.”
The comments section is the best way to communicate pertinent information to the PubCLEAR administrators (i.e., rationale for using non-standard templates, use of brand names, etc.).

Do you have permission from your Division Research Director to release this product?
- Yes
- No

Have you obtained other local approval to submit this work for publication clearance?
- Yes
- No

Local Approval
Scholarly activity projects must be approved by your program and by your Division GME Research Director.

Upload File

Full text of submission:
- Upload file from your computer
- Import file from remote site
- Link out to file on remote site

Additional Files
Check the box in this section if you have additional files to submit with your product. This includes consent forms, IRB decision letters, and division specific approval forms.
Additional Files

**PubCLEAR**

**Upload Supplemental Content**

If your submission includes supplementary material—such as spreadsheets, audio clips, or other material that isn’t part of the text portion of your work—you can upload it here. If you wish to upload a supplementary file, use the form below to locate the file on your computer.

Click the **Browse** button to upload the file. Repeat this process for each additional file you want to upload. When you are done, click **Continue**.

<table>
<thead>
<tr>
<th>Filename</th>
<th>Description</th>
<th>Upload new version</th>
<th>Sort</th>
<th>Show</th>
</tr>
</thead>
<tbody>
<tr>
<td>Test Article.pdf</td>
<td>Patient Consent Form</td>
<td>Choose File</td>
<td>No file chosen</td>
<td>1</td>
</tr>
</tbody>
</table>

Checked items will appear with the published submission.

*Please click the **Continue** button once after you’ve attached your supplemental files.*

---

**Supplemental Content page**

You will be able to add supplementary files to your submission using this page.

*Please note: You can only access this page after checking the “Additional Files” box on the submission form.*
Consent Forms

**ALL** document types that contain case reports require signed patient consent forms attached as an **Additional File** to the submission. These include the following documents:

- Written case reports
- Posters of case reports
- Presentations of case reports
- Clinical images/videos

The Consent and Authorization Form to Release Information for a Case Report is available [here](#).
## Successful Submission

![Image of successful submission]

### Submission Metadata

<table>
<thead>
<tr>
<th>Metadata Field</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Consent Form Requirement for Case Reports</td>
<td>I understand, but this does not apply to me as my document does not include a case report.</td>
</tr>
<tr>
<td>Title</td>
<td>My Full Document Title</td>
</tr>
<tr>
<td>Authors</td>
<td>Lindsey Pale, HCA Healthcare</td>
</tr>
<tr>
<td>Division</td>
<td>TriStar</td>
</tr>
<tr>
<td>Hospital</td>
<td>TriStar Centennial Medical Center</td>
</tr>
<tr>
<td>Relationship to Facility</td>
<td>Researcher-Employed</td>
</tr>
<tr>
<td>RELATIONSHIP TO FACILITY_OTHER</td>
<td>- Empty -</td>
</tr>
<tr>
<td>Document Type</td>
<td>Manuscript</td>
</tr>
<tr>
<td>If this is a case report, was patient seen at a non HCA Healthcare facility?</td>
<td>Not a Case Report</td>
</tr>
<tr>
<td>Research Project ID</td>
<td>0113</td>
</tr>
<tr>
<td>Anticipated Release Date</td>
<td>Summer 01-11-2022</td>
</tr>
<tr>
<td>Anticipated Release Entity</td>
<td>HCA Healthcare Journal of Medicine</td>
</tr>
<tr>
<td>Disciplines</td>
<td>Medicine and Health Sciences</td>
</tr>
<tr>
<td>Comments</td>
<td>- Empty -</td>
</tr>
<tr>
<td>Do you have permission from your Division Research Director to release this product?</td>
<td>yes</td>
</tr>
<tr>
<td>Have you obtained other local approval to submit this work for publication clearance?</td>
<td>yes</td>
</tr>
</tbody>
</table>

### Uploaded Files

- **File 1**
  - Name: FuCLEAR FAQS.docx
  - Size: 15 KB
  - Download
Checking on Your Submission

You can see the status of your submission by going to the **My Account** page and looking under PubCLEAR submissions.

- If the status is **UNDER REVIEW**, the submission has yet to be reviewed.
- You will receive an email when the status of your submission changes.
PubCLEAR approval – the first time!

A guide to expediting the publication clearance process
# Table of Contents

1. PubCLEAR Process Guide ......................................................... 18
2. Revisions: What to Avoid ........................................................ 19
   A. Small Edits ............................................................................. 20
      I. Improperly submitted
      II. No Research Project ID
      III. Doesn’t include accurate author information
      IV. No patient consent for external release of information
      V. No HCA Healthcare disclaimer/Improper disclaimer
      VI. Branding
      VII. Brand names
   B. Large Edits ............................................................................... 22
      I. HIPPA De-identification ......................................................... 22
      II. Image copyright violations .................................................... 25
      III. Non-standard templates ....................................................... 28
      IV. Sensitive information ............................................................. 29
   C. Understanding Clinical Review .............................................. 30
   D. Denial: When It Happens ......................................................... 31
PubCLEAR Process Guide

Investigating team submits product for clearance

PubCLEAR Administrator receives product

21-30 days

Administrator reviews product

Revisions needed?

Yes

Administrator requests revisions

Resident revises product

No

No

Clinical Review Needed?

Yes

Administrator assigns reviewer, receives feedback

No

Work cleared for publication?

Yes

Product cleared for publication

No

Product denied clearance

Questions about your submission? Email Pub.CLEAR@hcahealthcare.com with your question and submission ID.
Revisions: What to Avoid
Small Edits

The majority of resubmissions are the result of minor edits. These can easily be fixed before submitting and can speed up clearance times for everyone.

IMPROPERLY SUBMITTED

Make sure you follow the instructions in the PubCLEAR Guide. Clearance requests submitted incorrectly will be sent back for correction without review.

NO RESEARCH PROJECT ID

For scholarly activity tracking purposes, all projects are required to obtain a Research Project ID via the DATACLEAR process whether they require HCA Healthcare data or not. Submissions without a valid Research Project ID will be returned for revisions.

DOESN’T INCLUDE ACCURATE AUTHOR INFORMATION

Make sure all author information is correct. HCA Healthcare authors MUST use their professional email addresses. Division Research Directors’ names and email address must be included on the author list for communication purposes.

NO PATIENT CONSENT FORM FOR EXTERNAL RELEASE OF INFORMATION

All case reports require a consent form that allows for external release of information. Please use The Consent and Authorization Form to Release Information for a Case Report that is available here and attach it as an Additional File on the submission form.
Small Edits

The majority of resubmissions are the result of minor edits. These can easily be fixed before submitting and can speed up clearance times for everyone.

NO HCA HEALTHCARE DISCLAIMER

Every type of scholarly product (excluding abstracts) must contain the HCA Healthcare disclaimer. This disclaimer can go in or around your funding, disclosure, or acknowledgements section. Full text below:

This research was supported (in whole or in part) by HCA Healthcare and/or an HCA Healthcare affiliated entity. The views expressed in this publication represent those of the author(s) and do not necessarily represent the official views of HCA Healthcare or any of its affiliated entities.

Note: Audio files must have the HCA Healthcare disclaimer narrated as part of the file. Video files must have the HCA Healthcare disclaimer present in the video file.

BRANDING

HCA Healthcare brand colors and fonts should be used if possible. “HCA” should never be used without “Healthcare”, and the term should never be broken up by a line break.

BRAND NAMES

Whenever possible, use generic names for pharmaceuticals. Unless scientifically relevant, avoid all use of vendor names when referencing products/services in text or photographs. If scientifically relevant, you will likely need to seek permission from the purchasing contract owner to assure we are not violating any agreements or business expectations.
Large Edits: HIPAA De-Identification

For a scholarly product to be HIPAA De-Identified, the following information MUST be removed:

1. **Names**
2. **All geographic subdivisions smaller than a state**, except for the initial three digits of a ZIP Code if, according to the current publicly available data:
   1. The geographic unit formed by combining all ZIP Codes with the same three initial digits contains more than 20,000 people.
   2. The initial three digits of a ZIP Code for all such geographic units containing 20,000 or fewer people are changed to 000.
3. **All elements of dates (except year) for dates directly related to an individual**, including birth date, admission date, discharge date, date of death; and **all ages over 89** and all elements of dates (including year) indicative of such age, except that such ages and elements may be aggregated into a single category of age 90 or older.
4. **Telephone numbers**
5. **Facsimile numbers**
6. **Electronic mail addresses**
7. **Social security numbers**
8. **Medical record numbers**
9. **Health plan beneficiary numbers**
10. **Account numbers**
Large Edits: HIPAA De-Identification

11. Certificate/license numbers
12. Vehicle identifiers and serial numbers, including license plate numbers
13. Device identifiers and serial numbers
14. Web universal resource locators (URLs)
15. Internet protocol (IP) address numbers
16. Biometric identifiers, including fingerprints and voiceprints
17. Full-face photographic images and any comparable images

18. Any other unique identifying number, characteristic, or code however a covered entity may assign to, and retain with the health information a code or other means of record identification if that code is **not derived from or related to the information about the individual** (i.e. Initials) and **could not be translated to identify the individual**. The covered entity **may not use or disclose the code or other means of record identification for any other purpose** and may not disclose its method of re-identifying the information.
Common Examples of HIPAA Violations

Age over 89 must be hidden ("elderly", "89+", "over 90")

Identifying photographs

Ask yourself, “Could I recognize this person?”

PHI in images
Large Edits: Image Copyright Violations

Images used in your publications should either be of your own creation or used within the permissions of the image owner.

Copying and pasting images from the internet without assuring permissions may delay your publication or even result in legal action!

Unless otherwise specified, images and figures published in journal articles are under copyright protection by the publisher/journal. Permission must be granted by the copyright holder to reproduce a published image even if you are the author of the original publication.

HCA Healthcare maintains a subscription to the Copyright Clearance Center that grants certain permissions for copyrighted content. Verify the usage restrictions and permissions for the publication prior to the use of an image.

All non-original images and figures MUST be cited and attributed.
# Sources for HCA Healthcare Licensed/Public Domain Images

<table>
<thead>
<tr>
<th>Source</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>HCA MediaWorks</td>
<td>HCA Healthcare MediaWorks has a variety of HCA Healthcare approved icons, logos, and stock photos</td>
</tr>
<tr>
<td>National Institutes of Health</td>
<td>NIH images, including illustrations and scientific images</td>
</tr>
<tr>
<td>National Library of Medicine</td>
<td>National Library of Medicine images; includes collections on a variety of topics (e.g., history of medicine, health policy, NLM publications, NIH reports, historical images).</td>
</tr>
<tr>
<td>National Cancer Institute Visuals Online</td>
<td>Cancer related images and illustrations</td>
</tr>
<tr>
<td>Centers for Disease Control and Prevention: Public Health Image Library</td>
<td>Public health images</td>
</tr>
<tr>
<td>National Library of Medicine: MedPix</td>
<td>Case images; for personal use (e.g., teaching purposes)</td>
</tr>
<tr>
<td>Health Education Assets Library</td>
<td>Various images for health sciences education. Large collection of ECG examples, hematology images, histology images, and surgical illustrations</td>
</tr>
<tr>
<td>Duke University Medical Center Library and Archives</td>
<td>Links to various image collections by specialty. Note that each source may have different guidelines for reuse.</td>
</tr>
<tr>
<td>Unsplash</td>
<td>Stock Photos</td>
</tr>
</tbody>
</table>
Searching for Images and Associated Usage Rights

Search engines have “tools” or “advanced search” options to filter by usage rights.

For images found on Wikipedia or other websites, view the source information of the image.
Large Edits: Non-Standard Template

Posters should share a common look and feel whenever possible. The approved poster/presentation templates are found on MediaWorks here.

If you need to justify the need for use of a non-standard template, please do so in the comments section of your submission.

Note that your non-standard poster must include the HCA Healthcare logo and disclaimer:

This research was supported (in whole or in part) by HCA Healthcare and/or an HCA Healthcare affiliated entity. The views expressed in this publication represent those of the author(s) and do not necessarily represent the official views of HCA Healthcare or any of its affiliated entities.
Large Edits: Sensitive Information

Cost Information
Our cost information is confidential! Do not include costs unless you are getting them from publically available sources. You may also use percentage improvement instead of using our confidential cost information. For example, instead of saying “HCA Healthcare costs went down from $750 to $500” you can state “HCA Healthcare experienced a 33% cost reduction.”

Sensitive Statistics
When it is necessary to include statistics that are also part of public or accreditation reporting (e.g. infection rates), be sure the statistics are the same as those publically reported or describe how you calculated them differently.
Understanding Clinical Review

What is Clinical Review?

Clinical Review is the process of tagging a subject expert reviewer to evaluate a submission.

Why would a product need Clinical Review?

• Includes potentially sensitive information
• Requires high level clinical knowledge to review
• Potential intellectual property
• Informs future internal practice
Denial: When it Happens

Plagiarism
- If a submission is flagged for plagiarism, the request is immediately denied. An email is sent to all authors and the Division Research Director. An edited submission can be sent for clearance.

Multiple requests for the same product
- There is one request per product (case report, abstract, manuscript, etc.) Please have only one open submission per product.

Multiple products on same request
- There is one product (case report, abstract, manuscript, etc.) per request. Please have only one product per open submission.
Denial: When it Happens 📸

Already published

- The purpose of the publication clearance process is to review products before they are released externally. PubCLEAR administrators will not retroactively approve a released product.

Submitted without the permission of Division Research Director

- All submissions require knowledge and approval of the Division Research Director. Submission without approval voids the submission agreement.

Data obtained against HCA Healthcare standard procedure

- Submissions with HCA Healthcare health data obtained outside of standard procedure will be denied. Contact your division research leadership for more information on collecting and requesting data.
PubCLEAR Questions?

Email Pub.CLEAR@HCAHealthcare.com for more information. Be sure to include your submission ID in all communication with PubCLEAR administrators.