PubCLEAR Guide

HCA Healthcare Graduate Medical Education

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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.**
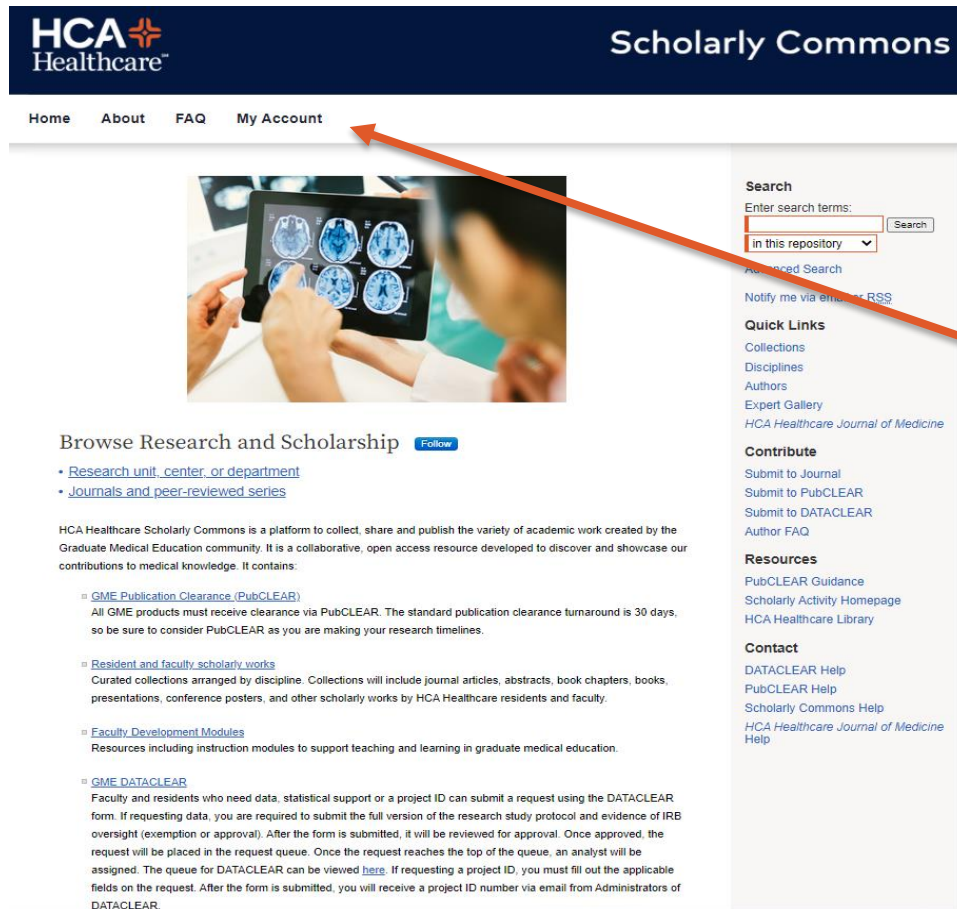
What PubCLEAR isn't…

- 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.

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How long does clearance take?

- Administrator reviews product within **30 days** on average.

- Submissions are reviewed in the order they are received.

  o This includes updates to previously reviewed submissions.

- Allow for extended review time for documents that requires a clinical review.

- Time to final approval is **NOT** guaranteed.

- PubCLEAR process does **NOT** allow for any expedited review.

IMPORTANT – Be aware that the longer you wait to submit, the greater the chance your submission will not be cleared in time for your deadline with the anticipated release entity. This is especially true during **conference season** when the number of PubCLEAR submissions significantly increases. **DO NOT WAIT UNTIL THE LAST MINUTE TO SUBMIT!**

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Getting started

- Go to
https://scholarlycommons.hcahealthcare.com/

Click on **My Account**.

Create New Account

Login

Email address:

Password:

☐ Remember me   **Login**

Forget your password?

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

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.

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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. Bepress neither sells nor rents 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.

Begin typing...

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**.

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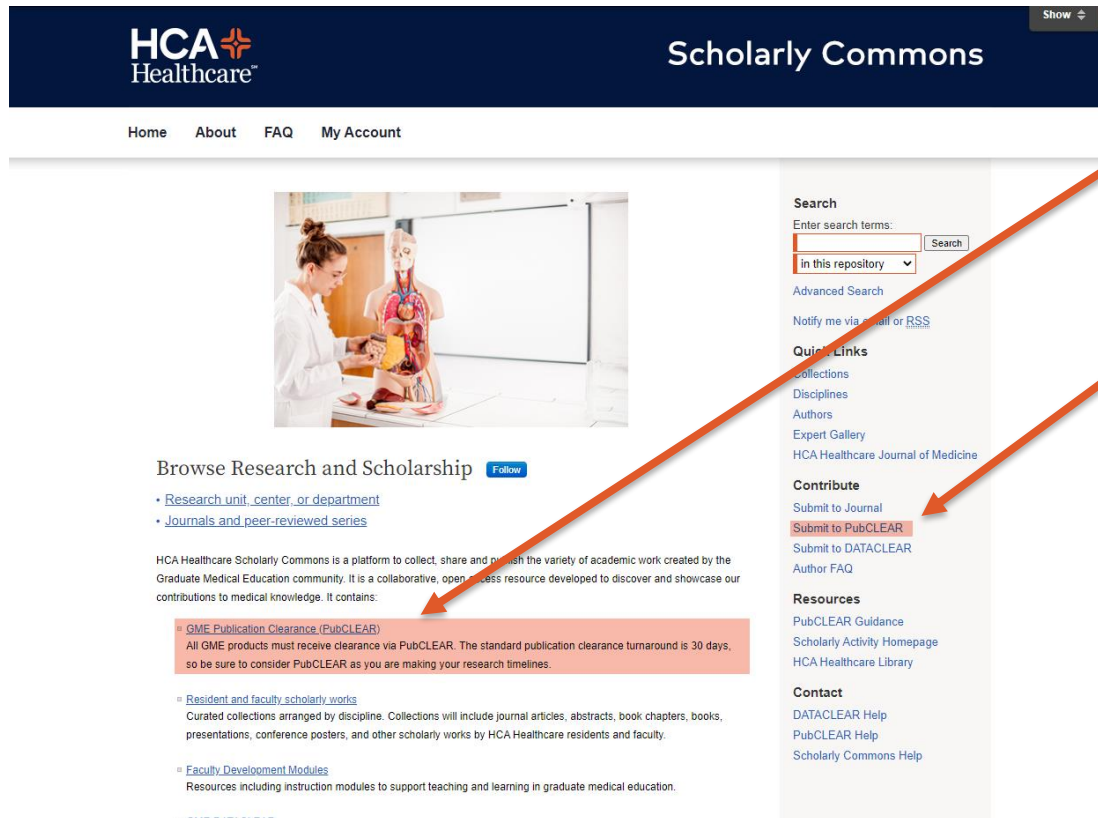
How to Submit

Two ways to submit:

1. **GME Publication Clearance** hyperlink in the center of the page

2. **Submit to PubCLEAR** on sidebar

Submission Agreement

PUBCLEAR

Submission Agreement

Follow the instructions below to submit to *PubCLEAR*. You will be notified regarding the status of your submission within 30 days. All products must obtain publication clearance prior to external (outside of HCA Healthcare) release. Publication clearance is tied to product and not entity or occasion.

Before submitting, please read all relevant policies and/or submission guidelines.

The submission process consists of the following steps:
1. Read and accept the Submission Agreement below
2. Provide information about yourself, any co-authors, and your Division Research Director
3. Upload your electronic file and, if any, supplemental files

Before you begin, please be sure you have the following items:
- The submission's title
- The anticipated release date
- Research Project ID number (Reference DataCLEAR submission number)
- The FINAL, submission ready electronic version of your product

Submission Agreement for *PubCLEAR*

By checking the box below, I agree to the terms on this page.

I warrant as follows:
1. that I have the full power and authority to make this agreement;
2. that the product does not infringe any copyright, nor violate any proprietary rights, nor contain any libelous matter, nor invade the privacy of any person or third party;
3. that the product has not been published externally with the same content or in the same format;
4. that I have obtained any necessary institutional review board documentation; and;
5. that I have obtained permission from my Division Research Director to release this work.
6. that I have obtained other local approval to submit this work for publication clearance.

NOTE: It is suggested that you print this page for your records.

☑ Please check this if you agree to the above terms.

Continue

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

GME PUBCLEAR 2023

REQUIRED 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.

NOTE: All submissions requesting a patient consent exemption will be routed to clinical review.

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.
- ○ I am requesting an exemption for case report patient consent as the patient is deceased.
- ○ I am requesting an exemption for case report patient consent as this is a non-patient facing case (e.g., radiology or pathology)

REQUIRED Title

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

Enter title:
[   ]

Title
This is the full, complete title of your scholarly product.

REQUIRED Authors

Please add your Division Research Director as last author for communication purposes. SUBMISSIONS WITHOUT A DRD AS AN AUTHOR WILL BE SENT BACK WITHOUT REVIEW.

All HCA Affiliated Submitters/Authors will select HCA Healthcare as their institution. Please use your HCA Healthcare affiliated email address. If an HCA Healthcare affiliated email is not included, the submission will be returned for revisions without review.

Search For An Author Using: Last Name, First Name, Email, or Institution

| 1 | (lindsay.pate@hcahealthcare.com) Lindsay Pate, HCA Healthcare |

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.

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Submission Form Continued

Division

REQUIRED Division

Select Division ▾

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

REQUIRED Hospital

Select Hospital ▾

Hospital
Choose the hospital of the submitting author.

REQUIRED Relationship to Facility

Select Relationship ▾

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

If you have selected "Other" above, please specify:

REQUIRED Document Type

Select from the following document types:
Select Document Type ▾

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

REQUIRED Research Project ID

Please enter your Research Project ID number.

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

REQUIRED Anticipated Release Date

If an exact release date is unknown, please provide your best estimate.

Season	Month	Day	Year
--	--	--	

Release Date
When do you anticipate sending this product to an external entity?

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Submission Form Continued

Releasing Entity Type

○ **Publication**
○ **Presentation**

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.

Release Entity
Where will you be submitting your product? Typically the name of a journal or conference.

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:

Select »
« Remove

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."

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Submission Form Continued

Comments

Please insert any relevant comments. If using a non-standard template for a poster or presentation please explain its necessity.

Comments

> **B** *I* | list | numbered list | link | unlink | x_2 x^2 | HTML
> ✂ 📋 📋 | undo redo | 🖼

Comments
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.).

REQUIRED Do you have permission from your Division Research Director to release this product?

○ Yes
○ No

REQUIRED 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.

REQUIRED 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

(ex. patient consent forms, IRB letters, other supplementary material)

Please check this if you'd like to add additional files ☐

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.

Cancel Submit
This may take a while. **Please only click once.**

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Additional Files

PubCLEAR

Upload Supplemental Content

If your submission includes supplementary material--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**.

Upload a new file: [Choose File] No file chosen

Filename	Description	Upload new version	Sort	Show
Test Article.pdf	Patient Consent Form	[Choose File] No file chosen	1	✔

Checked items will appear with the published submission. [Save]

Please click the **Continue** button once after you've attached your supplemental files. [Continue]

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.

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Consent Forms

All document types that contain case reports require fully completed and signed patient consent forms attached as **Additional Files**. These document types include the following:

- Written case reports

- Posters of case reports

- Presentations of case reports

- Clinical images/videos

Important Notes

- Be aware that the only acceptable patient consent form is one that explicitly allows external release of the patient's information. Use the **Authorization to Use and Disclose Information for Case Reports** available for download <u>here</u>.

- Any verbal consent must be witnessed and documented on the form by a non-biased third-party.

- Submissions that request exemptions because the patient is either deceased or it is a non-patient facing case will be routed for clinical review.

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Successful Submission

You have successfully uploaded:
This is an example

Revise submission

Make another submission

Manage all submissions

Submission Metadata

Metadata Field	Value
Consent Form Requirement for Case Reports	I understand, but this does not apply to me as my document does not include a case report.
Academic Year	2023
Title	This is an example
Authors	Lindsay Pate, *HCA Healthcare*
Division	Not Applicable
Hospital	GME Corporate
Relationship to Facility	Researcher- Employed
RELATIONSHIPTOFACILITY_OTHER	- empty -
Document Type	Abstract
If this is a case report, was patient seen at a non-HCA Healthcare facility?	Not a Case Report
Research Project ID	0123
Anticipated Release Date	12-26-2023
Releasing Entity Type	Presentation
Anticipated Release Entity	TBD
Disciplines	Medicine and Health Sciences
Comments	- empty -
Do you have permission from your Division Research Director to release this product?	yes
Have you obtained other local approval to submit this work for publication clearance?	yes
Upload File	Download
Update Submission	Initial Submission
Additional File 1	10-31-22_pubclear guidance doc review.pdf (24 KB)

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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

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PubCLEAR Process Guide

Investigating team submits product for clearance

PubCLEAR Administrator receives product

21-30 days

Administrator reviews product

Questions about your submission? Email Pub.CLEAR@hcahealthcare.com with your question and submission ID.

Revisions needed?

Yes — Administrator requests revisions

No — Clinical Review Needed?

Administrator assigns reviewer, receives feedback — Yes

Resident revises product

Clinical Review Needed? — No

Work cleared for publication?

Yes — Product cleared for publication

No — Product denied clearance

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Revisions: What to Avoid

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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 HCA Healthcare affiliated 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 Authorization to Use and Disclose Information for Case Reports that is available here and attach it as an Additional File on the submission form.

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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.

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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")

Case Presentation

A 92 year old Caucasian female presented to a dermatology office with the complaint of intermittent dry areas and pimples on the top of her head for over a year. The patient had a history of androgenic alopecia affecting the vertex and
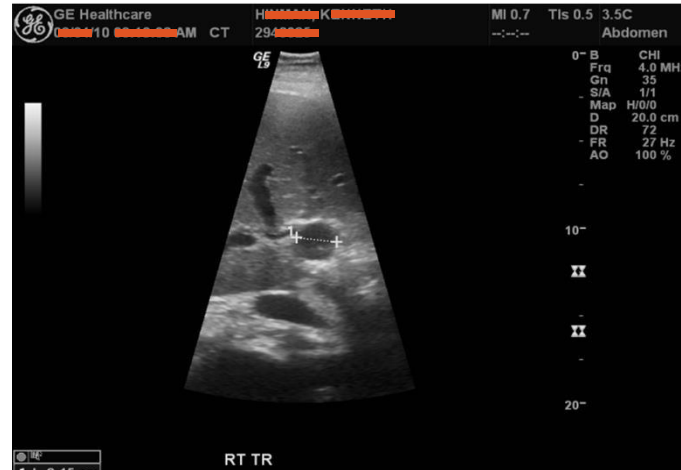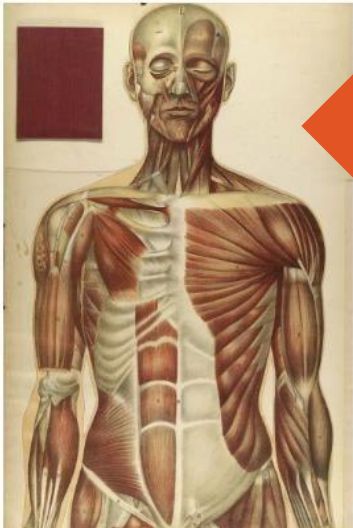
PHI in images

Identifying photographs

Ask yourself, "Could I recognize this person?"

Large Edits: Image Copyright Violations

The Human Body, 1899

NOT CITED

CITED

The Human Body, 1899

Le corps humain et grandeur naturelle by Julien Bouglé,

From: U.S. National Library of Medicine Historical

Anatomies on the Web

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. You may use this to verify the usage restrictions and permissions for the publication prior to the use of an image.

Always cite your sources!

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Creative Commons/Public Domain Sources

| Source	Description
Creative Commons	Stock Photos
NIH Image Gallery - Flickr	Flickr account for NIH images, including illustrations, scientific images and
National Library of Medicine	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).
National Cancer Institute Visuals Online	Cancer related images and illustrations
Centers for Disease Control and Prevention: Public Health Image Library	Public health images
Unsplash	Stock Photos
unDraw	Illustrations
pixabay	Stock Photos

Searching for Images and Associated Usage Rights

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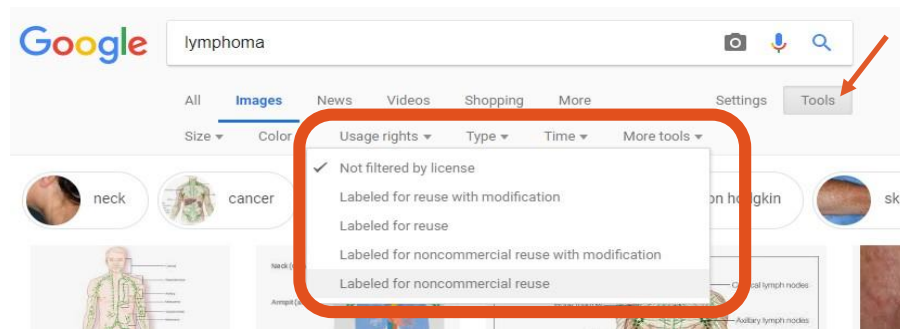

For images found on Wikipedia or other websites, view the source information of the image.
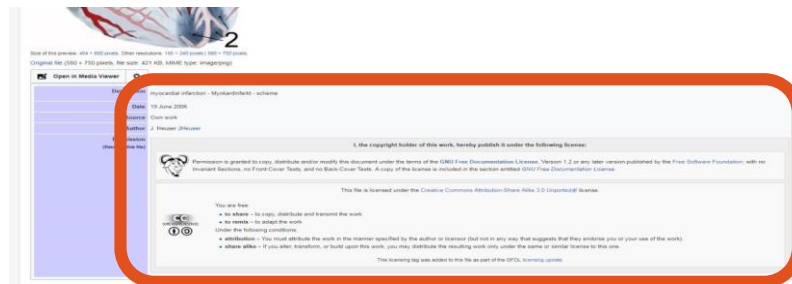
Large Edits: Non-Standard Template

Posters/presentations should share a common look and feel whenever possible. The approved templates for facilities are found on MediaWorks here. Corporate GME templates can be found on MediaWorks here. NOTE: Corporate templates are only to be used by GME authors not affiliated with a specific facility.
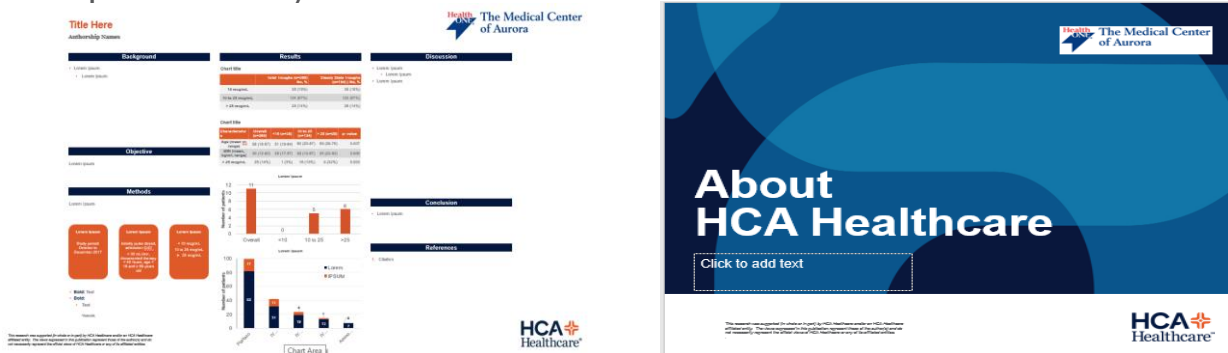
If you need to justify the need for use of a non-standard template, please do so in the comments section on the submission form.

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 publicly 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.

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Large Edits: Plagiarism

Plagiarism

- o If a submission is flagged for plagiarism, the submission is immediately sent back to the authors with a request for major revisions.

- o An email will be sent separately to the Division Research Director with an attachment of the scanned report.

- o The submitter may re-submit the edited document for clearance one time only.

- o An administrative denial will be issued if the edited document still produces a high match percentage.

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Understanding Clinical Review

What is Clinical Review?

Clinical Review is the process of tagging a subject expert reviewer to evaluate a submission. **Please be aware that this process will extend time to acceptance.**

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.

- All non-case report COVID-19 documents and abstracts.

- Any document type designated as Manuscript or Review Article on the submission form.

- Any requests for a patient consent exemption for one of the following reasons: the patient is deceased or it is a non-patient facing case (e.g., radiology or pathology).

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Denial: When it Happens 🔔

Multiple products on same request

o There is one product (case report, abstract, manuscript, etc.) per request. Please have only one product per open submission.

Already published

o 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.

Data obtained against HCA Healthcare standard procedure

o 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.

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PubCLEAR Questions?

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