

Information Management Policy: Sharing Data with External Entities

I. POLICY STATEMENT

It shall be the policy of the University of Maryland, School of Dentistry to capture, share, secure, maintain, and enhance the value of University of Maryland, School of Dentistry health information assets in all mediums through appropriate information management policies and actions that meet applicable Federal, State, regulatory, or contractual requirements and support the University of Maryland, School of Dentistry mission, vision, and values. Furthermore, it shall be the policy of University of Maryland, School of Dentistry to support and adhere to the rights and responsibilities of patients as specified in the State of Maryland Public Health and Mental Health Codes. It is the responsibility of the University of Maryland, School of Dentistry to ensure that these principles and policies are upheld even when individually identifiable health information in the custody of University of Maryland, School of Dentistry needs to be shared with other entities. Sharing of data shall be done by requiring potential data sharing partners to execute a Business Associate agreement which obliges them to handle the data in a manner consistent with Federal and State laws.

II. POLICY PURPOSE

The purpose of this policy is to inform University of Maryland, School of Dentistry personnel of the procedures that must be followed if individually identifiable health information is to be shared with an external entity.

III. STANDARDS

- A. External data users must not be permitted to access University of Maryland, School of Dentistry data assets unless the external users have completed a Business Associate Agreement with University of Maryland, School of Dentistry.
- B. There may be cases in which a state, federal, or regulatory agency requires that access be granted to it under law or regulation. In such cases, to the extent possible, a Business Associate Agreement meeting the criteria above shall be negotiated between University of Maryland, School of Dentistry and the agency before access is granted to the University of Maryland, School of Dentistry data assets.

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