POLICY STATEMENT
The American Board of Pediatrics, Inc. (ABP) collects data through normal business operations with the purposes of conducting and/or informing day-to-day operations at the ABP. Data are collected from sources including trainees, training programs, candidates for exams, and certified pediatricians (i.e., diplomates).

Sources that provide data, consisting of personally identifiable information (PII), anticipate the data will be protected, remain confidential, and will be used to inform ABP operations. The ABP values the privacy and sensitive nature of the individual and program-level data being collected.

At times, external entities may request ABP data for operational or research purposes. The ABP may also require data analytic capacity if not available internally. This policy addresses the principles and procedures regarding the sharing with and use of ABP data by external entities.

REQUESTS FOR INFORMATION
The ABP will respond to external requests for information from individuals or organizations on a case-by-case basis.

GENERAL PRINCIPLES REGARDING DATA SHARING
In general, the ABP does not provide its data in response to a request from an external party. The ABP does not provide data to commercial entities, such as pharmaceutical interest groups or manufacturers of medical devices.

If data are available in the public domain (e.g., the Annual Workforce Data Book), the data requestor will be referred to those data.

If a limited data set or analysis is requested, that request will be reviewed to determine if it aligns with the ABP mission and the Privacy Policy and then subsequently shared with the senior ABP staff representative in the relevant ABP department. The department will make the decision as to its ability to respond to the request. If extensive work is involved, depending on the current workload of ABP staff, the ABP may decline the request or charge the data requestor a fee that is commensurate with the time and effort required to assemble the data.

REQUESTS FOR ABP DATA USE FOR RESEARCH PURPOSES
Operational data (also termed “administrative data”) are increasingly employed to answer critical research or evaluation questions (hereafter, "research"), even though the primary purpose of the data is to inform operations.

The Research Department will track any requests for the use of ABP data for research purposes in order to identify trends or themes. Such trends can then be used to modify the ABP operational data that is shared with the pediatric community through products such as the Annual Workforce Data Book.
The Research Department will report on trends in the use of ABP data to the ABP senior leadership (see Appendix A).

The ABP does not release its mailing lists to external entities for any research purposes.

**ABP COLLABORATIONS WITH EXTERNAL ENTITIES USING ABP DATA**

At times, ABP senior leadership may collaborate with an external entity to analyze and disseminate ABP operational data. Collaborations, for the most part, will be initiated by the ABP, although ABP staff may decide to collaborate as a result of a request from an outside party.

Considerations regarding collaborations will take into account:

- The “added value” of the proposed work (e.g., its alignment with the mission, values, and guiding principles of the ABP and the ABP Foundation),
- The cost in terms of ABP human resources (e.g., data preparation, data interpretation, review of manuscripts),
- The feasibility of the proposed project timeline, and
- Qualifications of the external entity.

In addition, the ABP senior leadership will consider carefully any issues regarding the specific data elements proposed. These may include:

- Any limitations with respect to data sharing,
- Whether consent is needed from participants and subjects, particularly pertinent for prospective Research studies,
- The sensitivity of the data and any data security and management measures required,
- The associated research ethics considerations, including the potential need for an IRB review prior to release of the data, as outlined in the Parameters for Research and Other Systematic Investigations Policy, and
- Any fiscal costs for data preparation and management if data collection and/or data analysis is hosted off-site (e.g., third-party vendor for Part 4 data).

If the project is approved by the ABP senior leadership, a Memorandum of Understanding, or its equivalent, will be established with the external entity. A decision will be made regarding whether data analyses will be conducted on site by the ABP staff or if data sharing is appropriate. If data sharing is appropriate, a Data Use Agreement or the equivalent must be completed.

All data shared by the ABP shall remain the sole property of the ABP. Data analyzed by the external entity and associated products will be provided to the ABP on a periodic schedule detailed in any contract, agreement, or task order or its equivalent. The external entity must agree that no data provided by the ABP will be shared with other investigators, trainees, sites, or external entities without the explicit permission of the ABP.

The external entity must also agree to abide by all relevant ABP policies and guidances.
OWNERSHIP OF DATA
For any Research or other Systematic Investigations conducted with an external entity, careful
attention to ownership of the data collected and/or analyzed must be clearly stated and
memorialized in the corresponding contract, agreement, or task order or its equivalent. Since each
such activity is unique, data ownership will be determined on a case-by-case basis.

Intellectual property considerations will also be determined on a case-by-case basis and
memorialized in the corresponding contract, agreement, or task order or its equivalent.

Terms regarding data retention and destruction will be detailed in all agreements with the external
tility. Unless specified otherwise in a contract, the final set of analyses and code should be saved
by the lead author for five years following closure of the study and/or publication, whichever comes
last. If the analyses result in publications, copies of the final set of analyses and code for each paper
should be transmitted to the ABP Research Department for retention through a secure modality to
be determined at the time of transmission.

PRIVACY AND CONFIDENTIALITY
All ABP data shared with an external entity shall employ agreed upon standards to protect the
confidentiality of all participants and subjects. In general, the ABP will not share unique
identification of any participant or subject and will maintain confidentiality of the ABP’s candidates
and diplomats, members, and associates. If unique identifiers must be used in the research
project, then ABP staff and the Research Advisory Committee or its equivalent must approve the
external entity’s plan for identity masking and encryption before ABP data can be released. The
external entity must allow the ABP or its designee to audit the strength of masking and encryption
upon request.

Data will be exchanged via a secure service approved by the ABP. Data will be provided to the
external entity on a timeline that enables ABP staff to complete the additional work without
compromising ABP work. The ABP may also request that updated data files be transferred to the
ABP from the external entity on a periodic basis.

The ABP retains the right to prohibit the dissemination of any results that the ABP perceives may
breach the confidentiality of the ABP, the ABP Foundation, or any of the trainees or diplomats it
serves.

ASSOCIATED POLICIES AND/OR GUIDELINES
• Privacy Policy
• Research Activities and other Systematic Investigations Policy
• Communications About ABP Foundation-Funded Projects Policy

Policy Adopted Date: 11/16
Last Non-Contextual Revised: 09/19
Last Revision Approved by the Board of Directors/Executive Committee:
Appendix A. Annual Review of Requests for Use of ABP Data for Research Purposes

All requests will be logged into a historical record by the Research Team and reviewed on an annual basis by the ABP senior leadership to better understand the types of requests received. Requests will be categorized as to:

- Data Requestor and contact information
- Department and/or organization
- Date of request
- Type of data requested
- Decision