



ABP Corporate Policy

Data Sharing Policy

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.

This policy addresses the principles and procedures regarding the sharing with and use of ABP data by external entities.

DATA SHARING FOR EDUCATIONAL, OPERATIONAL, OR RESEARCH PURPOSES:

As part of its mission, the ABP makes some aggregated, de-identified data publicly available on its website, including workforce and certification data.

At times, the ABP makes the decision to share data with external entities. This is usually because the ABP chooses to contract with an external entity for the ABP's educational, operational, or research purposes.

More rarely, an external entity requests data for its educational, operational, or research purposes. In general, the ABP does not provide its data in response to a request from an external party. Collaborations for the most part are initiated by the ABP. ABP senior leadership may decide to collaborate as a result of a request from an external entity if its request aligns closely with our Privacy Policy, our mission, vision, values, guiding principles, and ABP and/or ABP Foundation strategic plans.

The ABP does not share data with

- Commercial entities, such as pharmaceutical interest groups or manufacturers of medical devices,
- External entities requesting the ABP's mailing list, and
- Trainees for research projects or scholarly activity.

REVIEW OF REQUESTS FOR ABP DATA

The ABP will respond to external requests for data from individuals or organizations on a case-by-case basis.

All requests will be reviewed by the relevant department(s) and the Privacy Department.

The following considerations regarding data requests/collaborations will take into account:

- The "added value" of the proposed work (e.g., its alignment with the mission, vision, values, guiding principles, and current strategic plans of the ABP and/or the ABP Foundation),
- The cost in terms of ABP human resources (e.g., data preparation, data interpretation, review



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- of manuscripts),
- The feasibility of the proposed project timeline,
- Qualifications of the external entity,
- Any issues regarding the specific data elements proposed,
- Any limitations with respect to data sharing,
- The sensitivity of the data and any data security and management measures required,
- 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), and
- If research, the associated ethical considerations, including the potential need for consent, or for an IRB review prior to release of the data, as outlined in the Parameters for Research and Other Systematic Investigations Policy.

If data sharing is approved, an agreement will be established with the external entity. If the request for data is on the part of an external entity, the ABP may choose to charge for the associated work effort.

COMMUNICATIONS

All public communications about ABP data use must be shared with the relevant contact at the ABP.

Any paper, presentation, or other published materials (e.g., website, informational handout) should acknowledge data received from the ABP using the language provided below with any necessary modification or elaboration.

“Data for this project [publication, presentation] was provided in part/in full by the American Board of Pediatrics.”

For papers, presentations, or curricular reports, the following disclaimer should be included:

“The content is solely the responsibility of the authors and does not necessarily represent the official views of the American Board of Pediatrics or the American Board of Pediatrics Foundation.”

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 diplomates it serves. If an external group disagrees, they may request review by the ABP Board of Directors. However, the final decision will rest with the ABP.