

LINE OF BUSINESS #3

INFORMATION MANAGER

– Provision of Information Manager Services –

Overview

The following activities are associated with NB-IRDT providing the physical infrastructure and data platform for Data Business Owners/Custodians' administrative data sets and addressing legislation requirements for Personal Information (PI) and or Personal Health Information (PHI).

As an *Information Manager* – defined under the Personal Health Information Protection and Privacy Act (PHIPAA) – NB-IRDT offers Information Manager services to Data Business Owners/Custodians, such as standardizing, formatting, or cleaning data sets.

These services do not provide any type of access to or use of data contained in one or more data holdings in the NB-IRDT data platform (with or without linking). Accessing PHI or PI stored in the NB-IRDT secure facility is available only as directed by the Data Business Owner/Custodian (i.e. Information Manager data are not available on the NB-IRDT data platform for a Data Access Application).

NB-IRDT may also act as an agent (defined under PHIPAA) for Data Business Owners/Custodians if the Data Business Owners/Custodian requests NB-IRDT carry out additional responsibilities beyond the scope of an Information Manager.

The following describes business process activities associated with the provision of the 3 Information Manager service options by NB-IRDT:

- A) Processing, storing, retrieving, archiving or disposing of PI or PHI for a Data Business Owner/Custodian**
- B) Providing third-party secure data access for users who have entered into a data sharing agreement with the data business owner**
- C) Value-added services (e.g. data quality assurance, using client's data sets - special one-off assistance, analysis, etc.)**

Information Manager Agreement and Contract		
Business Process Step	Description	Business User/Actor
1. Initiation of Process	<p>A Data Business Owner/Custodian contacts the Institute to determine if NB-IRDT is the right resource to serve as an Information Manager (IM). An initial conversation with the NB-IRDT Director and/or the Research, Evaluation & Training Manager is required.</p> <p>If the request is out of scope for IM services, and if appropriate, the Data Business Owner/Custodian will be redirected to another NB-IRDT Line of Business.</p>	<p>Data Business Owner/Custodian</p> <p>NB-IRDT Director</p> <p>NB-IRDT Research, Evaluation & Training Manager</p>
2. Feasibility Review	<p>The Data Business Owner/Custodian submits a written request to the NB-IRDT Research, Evaluation & Training Manager outlining the nature of the IM service they are seeking, including the data set(s) to be stored, data set variables, designated individual or individuals' with authorization to access, and disclosure specifications.</p> <p>If appropriate, a request is made by a potential research group/government department/etc. for Research Ethics Board approval.</p>	<p>NB-IRDT Director</p> <p>NB-IRDT Research, Evaluation & Training Manager</p> <p>Data Business Owner/Custodian</p>
3. Information Manager (IM) Service estimate prepared for Data Business Owner/Custodian	<p>The NB-IRDT Director and/or Research, Evaluation & Training Manager review the scope of the proposed IM service requested, identifying required staff time and resources.</p> <p>After consultation with the NB-IRDT Research, Evaluation & Training Manager, a letter estimating costs is provided to the Data Business Owner/Custodian.</p>	<p>NB-IRDT Director</p> <p>NB-IRDT Research, Evaluation and Training Manager</p> <p>Data Business Owner/Custodian</p>

Information Manager Agreement and Contract		
Business Process Step	Description	Business User/Actor
	The Data Business Owner/Custodian makes the decision whether to proceed.	
4. NB-IRDT Staff are notified of project	<p>Once a decision to proceed with the IM service is confirmed, the NB-IRDT Research, Evaluation & Training Manager will inform the NB-IRD Data Transfer Coordinator and Privacy Officer.</p> <p>The NB-IRDT Data Transfer Coordinator assigns an IM project number and notifies the following NB-IRDT Staff of the project and tracking number indicating the type of Information Manager service provided as stated on Page 1 above (Option a, b, or c):</p> <ul style="list-style-type: none"> • Project Coordinator (project tracking) • Operations Manager (billing) • Research, Evaluation & Training Manager (billing) • Senior Data Analyst (project data set preparation) • Data Management (data inventory & tracking) 	<p>NB-IRDT Research, Evaluation & Training Manager</p> <p>NB-IRDT Data Transfer Coordinator</p>
5. External Agreement(s) confirmation	<p>If the Data Business Owner/Custodian is transferring data from a third party to NB-IRDT, the Data Business Owner/Custodian must forward the appropriate agreements, indicating that the data will be accessed through NB-IRDT, to the NB-IRDT Data Transfer Coordinator.</p> <p>Agreements are shared with the UNB Office of Research Services.</p>	<p>Data Business Owner/Custodian</p> <p>NB-IRDT Data Transfer Coordinator</p>

Information Manager Agreement and Contract		
Business Process Step	Description	Business User/Actor
6. Appropriate Agreement & Service Contract and/or Statement of Work	<p>The NB-IRDT Research, Evaluation & Training Manager, Data Transfer Coordinator, and Privacy Officer will initiate and facilitate the completion of the appropriate Information Manager Agreement (IMA) and Service Contract with the Data Business Owner/Custodian and the UNB Office of Research Services.</p> <p>The NB-IRDT Research, Evaluation & Training Manager informs the NB-IRDT Operations Manager of the billing plan.</p>	<p>NB-IRDT Research, Evaluation & Training Manager</p> <p>NB-IRDT Data Transfer Coordinator</p> <p>NB-IRDT Privacy Officer</p> <p>UNB Office of Research Services</p> <p>Data Business Owner/Custodian</p> <p>NB-IRDT Operations Manager</p>
7. Billing and payment schedule	<p>The NB-IRDT Operations Manager will bill as directed in the IMA. This may be a one-time payment due or may be divided based on deliverables.</p> <p>NOTE: The NB-IRDT Operations Manager will need to be notified throughout the project as necessary for billing.</p>	<p>NB-IRDT Operations Manager</p>
8. Data Business Owner/Custodian transfers data to NBIRDRT	<p>Once the Information Manager Agreement is completed, data may be transferred to NB-IRDT following the <i>Data Transfer to NB-IRDT Standard Operating Procedure</i>.</p> <p>The NB-IRDT Senior Data Analyst receives the data.</p>	<p>Data Business Owner/Custodian</p> <p>NB-IRDT Privacy Officer</p>

Information Manager Agreement and Contract		
Business Process Step	Description	Business User/Actor
	An NB-IRDT Data Management representative provides a certificate of receipt for the data transferred	NB-IRDT Senior Data Analyst NB-IRDT Data Management

A) Processing, storing, retrieving, archiving, or disposing of PI or PHI for a Data Business Owner/Custodian		
Business Process Step	Description	Business User/Actor
A1. IM Service Provided	<p>The NB-IRDT Data Transfer Coordinator will</p> <ul style="list-style-type: none"> • Inform the NB-IRDT Senior Data Analyst of any accounts and working folders required. • Inform the NB-IRDT Research, Evaluation & Training Manager that data transfer is complete, and any contracted service work may begin by the NB-IRDT Assigned Staff. <p>NOTE: All Data Business Owners/Custodians seeking to access their data once held in the secure custody of NB-IRDT must follow the regular process to become an NB-IRDT Approved User (See steps B1-B5 below)</p>	<p>NB-IRDT Data Transfer Coordinator</p> <p>NB-IRDT Senior Data Analyst</p> <p>NB-IRDT Research, Evaluation & Training Manager</p>
A2. IM Project Closure	At project closure, policies for data retention, return, or destruction will be followed as stated in the IMA or, if not stated the <i>NB-IRDT Record Retention & Disposition Schedules</i> will be followed	<p>NB-IRDT Systems Administrator</p> <p>NB-IRDT Senior Data Analyst</p>

B) Providing third party secure data access for users who have entered into a data sharing agreement with the data business owner

Business Process Step	Description	Business User/Actor
B1. Data Privacy Training	<p>NOTE: All third-party data users identified by the Data Business Owners/Custodians must follow the regular process to become NB-IRDT Approved Users to enter the secure facilities.</p> <p>The NB-IRDT Privacy Officer provides Approved Users with privacy training focusing on administrative data and secondary use of data.</p>	<p>NB-IDT Privacy Officer</p> <p>Approved User(s)</p>
B2. Data Security Training and Orientation	<p>The NB-IRDT Senior Data Analyst provides Approved Users with Data Security Training and Orientation focusing on data disclosure and vetting rules considerations.</p>	<p>NB-IRDT Senior Data Analyst</p> <p>Approved User(s)</p>
B3. Approved User(s) Documentation	<p>All Approved Users must complete and submit the following to the NB-IRDT Project Coordinator or Privacy Officer:</p> <ol style="list-style-type: none"> 1. A signed <i>Confidentiality Agreement</i> - signed by UNB ORS Signing Authority and the Approved User (UNB ORS holds all original signed copies). 2. A <i>Criminal Record Check</i> completed within the last 12 months (stored with NB-IRDT) 3. A signed and completed <i>Approved User Form</i> (stored with NB-IRDT) <p><i>Confidentially Agreements</i> and <i>Approved User Forms</i> are provided for completion by the NB-IRDT Privacy Officer following training sessions.</p>	<p>Approved User(s)</p> <p>NB-IRDT Project Coordinator or Privacy Officer</p>

<p>B4. IM project details are communicated to the NB-IRDT Senior Data Analyst</p>	<p>The NB-IRDT Data Transfer Coordinator provides the NB-IRDT Senior Data Analyst and Privacy Officer</p> <ul style="list-style-type: none"> • a list of all relevant data set(s), • lists of variables to which the Data Business Owner/Custodian is permitting access, • the start date and end date of the project, • disclosure specifications, and • any other necessary IMA details relevant to the IM project data set preparation. 	<p>NB-IRDT Data Transfer Coordinator</p> <p>NB-IRDT Senior Data Analyst</p>
<p>B5. IM project preparation</p>	<p>The NB-IRDT Senior Data Analyst will extract the identified data according to the project specifications.</p> <p>NOTE: IM data sets are stored in a secure partition of the NB-IRDT server separate from the NB-IRDT data platform.</p>	<p>NB-IRDT Senior Data Analyst</p>

<p>B6. Secure facility access</p>	<p>When project folders are ready, the NB-IRDT Senior Data Analyst informs the following individuals by email:</p> <ul style="list-style-type: none"> • the Approved Users • NB-IRDT Research, Training & Evaluation Manager (confirm start of work) • NB-IRDT Privacy Officer (confirm start of work) • NB-IRDT Data Transfer Coordinator (track of data access and use) • NB-IRDT System Administrator (start door card access) • NB-IRDT Administrative Assistant (start approved user record) <p>At NB-IRDT Fredericton: the NB-IRDT Systems Administrator activates (with set parameters including start and end dates) the Approved Users' UNB UCard, which is used to access to the secure facility in Fredericton. The Approved Users are responsible for their own passwords and security administrated through the UNB UCard Office.</p> <p>If an Approved User is not affiliated with UNB Fredericton, the NB-IRDT Administrative Assistant can request a guest card.</p> <p>At NB-IRDT Saint John (UNB Saint John) or NB-IRDT Moncton (Université de Moncton): the NB-IRDT Systems Administrator informs the appropriate campus security offices that new campus cards will be needed for Approved Users, including the</p>	<p>NB-IRDT Senior Data Analyst</p> <p>NB-IRDT Research Training and Evaluation Manage</p> <p>NB-IRDT Systems Administrator</p> <p>NB-IRD Administrative Assistant</p> <p>UNB Saint John and Université de Moncton campus security</p> <p>Approved User(s)</p>
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	<p>necessary parameters for access such as project start and end dates.</p> <p>Approved Users are responsible for the pick-up and security of their cards.</p>	
<p>B7. Request to upload programming code to be used to facilitate research (if applicable)</p>	<p>Approved User(s) requesting to use particular programming code for analysis work (in keeping with the objectives of the approved research project) may send the programming code to the NB-IRDT Senior Data Analyst by email in a plain text format.</p> <p>The NB-IRDT Senior Data Analyst scans the file to ensure there are no viruses attached and reviews the code to ensure the file does not contain any data that may increase the risk of identification of the project data.</p> <p>Once it has been vetted, the NB-IRDT Senior Data Analyst will add the code to the IM project folder for access.</p>	<p>Approved User(s)</p> <p>NB-IRDT Senior Data Analyst</p>
<p>B8. Research work</p>	<p>Approved User(s) access and work with data as agreed.</p>	<p>Approved User(s)</p>
<p>B9. Preparation of research findings for external release</p>	<p>Approved Users may create research summaries and reports using the aggregated data sets developed through their research/analysis to include in their research outcomes.</p> <p>In their project folders, Approved Users prepare the results they seek to have disclosed and file a disclosure request.</p> <p>A disclosure request must include a completed <i>NB-IRDT Disclosure Request</i> form, all data they seek to have released, and supporting documents such as subsampling variable specifications and programming</p>	<p>Approved User(s)</p> <p>NB-IRDT Senior Data Analyst</p>

	<p>code/syntax used to create the results (if applicable).</p> <p>Once the disclosure request is saved the Approved User may notify the NB-IRDT Senior Data Analyst that the request is ready.</p>	
<p>B10. Data disclosure vetting (assessment of disclosure risk and release of aggregated results)</p>	<p>The NB-IRDT Senior Data Analyst reviews all disclosure request results and programming code/syntax.</p> <p>The NB-IRDT Senior Data Analyst vets the requested disclosure for methods and potential risks, including but not limited to</p> <ul style="list-style-type: none"> • proper compilation, • remaining within the project scope, • residual disclosure, • application of vetting rules (e.g. minimum cell counts, random rounding, and, • potential re-identification. <p>Only after the NB-IRDT Senior Data Analyst is satisfied that the requested disclosure has no risk or minimal risk of (re-)identification will the aggregated results be released to the Approved Users.</p> <p>The NB-IRDT Senior Data Analyst copies the requested files and emails them to the Approved Users from the NB-IRDT Senior Data Analyst's internet-accessible computer.</p> <p>NOTE: Questions or concerns in relation to vetted releases are to be raised with the NB-IRDT Vetting Committee; contact the NB-IRDT Privacy Officer.</p>	<p>NB-IRDT Senior Data Analyst</p> <p>NB-IRDT Vetting Committee</p> <p>NB-IRDT Privacy Officer</p>

	<p>NOTE: Vetting parameters are as agreed in the IMA. If parameters are not set in the IMA, the regular NB-IRDT disclosure practices apply.</p>	
B11. IM Agreement ends	<p>When vetted results are released, the NB-IRDT Senior Data Analyst informs the following staff by email:</p> <ul style="list-style-type: none"> • NB-IRDT Research, Training & Evaluation Manager (confirm terms and conditions of agreement are met) • NB-IRDT Project Coordinator (coordinating the project closure process) • NB-IRDT Privacy Officer (confirm terms and conditions of agreement are met) • NB-IRDT Data Transfer Coordinator (initiate data return if required) • NB-IRDT System Administrator (remove door card access) • NB-IRDT Administrative Assistant (update approved user records) • NB-IRDT Operations Manager (final billing and or 	NB-IRDT Senior Data Analyst
B12. IMA project modifications, including extensions	<p>Project modifications such as the addition of data, changes in usage, or extension of the project require an amendment to the IMA and proof of modifications to relevant Data Access Agreements.</p> <p>The Data Business Owner/Custodian must negotiate any modifications with the NB-IRDT Research, Evaluation & Training Manager, Data Transfer Coordinator, and Privacy Officer.</p>	<p>Data Business Owner/Custodian</p> <p>NB-IRDT Research, Evaluation & Training Manager</p> <p>NB-IRDT Data Transfer Coordinator</p>

	<p>The NB-IRDT Research, Evaluation & Training Manager, Data Transfer Coordinator, and Privacy Officer facilitate the necessary amendments to the Information Manager Agreement and Statement of Work (if appropriate).</p> <p>The NB-IRDT Data Transfer Coordinator informs the NB-IRDT Senior Data Analyst of the necessary modifications.</p> <p>The NB-IRDT Data Transfer Coordinator informs NB-IRDT Data Management if there are changes needed to data tracking.</p>	<p>NB-IRDT Privacy Officer</p> <p>NB-IRDT Senior Data Analyst</p> <p>NB-IRDT Data Management</p>
B13. User access removed	<p>The end date for Approved Users' access is the same date as the project closure. The NB-IRDT Senior Data Analyst removes access to the project folder on this date.</p> <p>The NB-IRDT Systems Administrator removes user access to the secure facility on this date unless an appropriate amendment is in place or the user has other active projects to work on.</p>	<p>NB-IRDT Senior Data Analyst</p> <p>NB-IRDT Systems Administrator</p>
B14. IM Project Closure	<p>At project closure, policies for data retention, return, or destruction will be followed as stated in the IMA or, if not stated, the <i>NB-IRDT Record Retention & Disposition Schedules</i> will be applied.</p>	<p>NB-IRDT Systems Administrator</p> <p>NB-IRDT Data Management</p>

C) Value added services (e.g. data quality assurance, using client's data sets - special one-off assistance, analysis, etc.)

Business Process Step	Description	Business User/Actor
C1. IM Service Provided	<p>The NB-IRDT Data Transfer Coordinator will</p> <ul style="list-style-type: none"> • Inform the NB-IRDT Senior Data Analyst of any necessary working folders required. • Inform the NB-IRDT Research, Evaluation & Training Manager that the NB-IRDT Assigned Staff may begin any contracted service. 	<p>NB-IRDT Data Transfer Coordinator</p> <p>NB-IRDT Research, Evaluation & Training Manager</p> <p>NB-IRDT Senior Data Analyst</p> <p>NB-IRDT Privacy Officer</p>
C2. IM project preparation	<p>The NB-IRDT Senior Data Analyst will extract the approved data following the project specifications.</p> <p>NOTE: IM data sets are stored in a secure partition of the NB-IRDT server separate from the NB-IRDT data platform.</p>	<p>NB-IRDT Senior Data Analyst</p>
C3. Request to upload programming code to be used to facilitate research (if applicable)	<p>NB-IRDT Assigned Staff requesting to use particular programming code for analysis work (in keeping with the objectives of the approved research project) may send the programming code to the NB-IRDT Senior Data Analyst by email in a plain text file format.</p> <p>The NB-IRDT Senior Data Analyst scans the file to ensure there are no viruses attached and reviews the code to ensure the file does not contain any</p>	<p>NB-IRDT Assigned Staff</p> <p>NB-IRDT Senior Data Analyst</p>

	<p>data that may increase the risk of identification of the project data.</p> <p>Once it has been vetted, the NB-IRDT Senior Data Analyst will add the code to the IM project folder for access.</p>	
C4. Research work	NB-IRDT Assigned Staff access and work with data as agreed.	NB-IRDT Assigned Staff
C5. Preparation of research findings for external release	<p>NB-IRDT Assigned Staff may create research summaries and reports using the aggregated data sets developed through their research/analysis to include in the service deliverables.</p> <p>In their project folders, NB-IRDT Assigned Staff prepare the results they seek to have disclosed and file a disclosure request.</p> <p>A disclosure request must include a completed <i>NB-IRDT Disclosure Request</i> form, all data they seek to have released, and supporting documents such as subsampling variable specifications and programming code/syntax used to create the results (if applicable).</p> <p>Once the disclosure request is saved, the NB-IRDT Assigned Staff notifies the NB-IRDT Senior Data Analyst that the request is ready.</p>	NB-IRDT Assigned Staff

<p>C6. Data disclosure vetting (assessment of disclosure risk and release of aggregated results)</p>	<p>The NB-IRDT Senior Data Analyst reviews all disclosure request results and programming code/syntax.</p> <p>The NB-IRDT Senior Data Analyst vets the requested disclosure for methods and potential risks, including but not limited to</p> <ul style="list-style-type: none"> • proper compilation, • remaining within project scope, • residual disclosure, • application of set vetting rules (e.g. minimum cell counts and random rounding, and • potential for re-identification. <p>Only after the NB-IRDT Senior Data Analyst is satisfied that the requested disclosure has no or minimal risk of (re-)identification will the aggregated results be released to the NB-IRDT Assigned Staff.</p> <p>The NB-IRDT Senior Data Analyst copies the requested files and emails them to the NB-IRDT Assigned Staff from the NB-IRDT Senior Data Analyst's internet-accessible computer.</p> <p>NOTE: Questions or concerns in relation to vetted releases are to be raised with the NB-IRDT Vetting Committee; contact the NB-IRDT Privacy Officer.</p> <p>NOTE: Vetting parameters are as agreed in the IMA. If parameters are not stated in the IMA, regular NB-IRDT disclosure practices apply.</p>	<p>NB-IRDT Senior Data Analyst</p> <p>NB-IRDT Assigned Staff</p> <p>NB-IRDT Privacy Officer</p> <p>NB-IRDT Vetting Committee</p>
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<p>C7. IM Agreement ends</p>	<p>When vetted results are released, the NB-IRDT Senior Data Analyst informs the following staff by email:</p> <ul style="list-style-type: none"> • NB-IRDT Research, Training & Evaluation Manager (confirm terms and conditions of agreement are met) • NB-IRDT Project Coordinator (coordinate the project closure process) • NB-IRDT Privacy Officer (confirm terms and conditions of agreement are met) • NB-IRDT Data Transfer Coordinator (initiate data return if required) • NB-IRDT System Administrator (remove door card access) • NB-IRDT Administrative Assistant (update approved user records) • NB-IRDT Operations Manager (final billing) 	
<p>C8. IMA project modifications including extensions</p>	<p>Project modifications such as the addition of data, changes in usage, or extension of the project require an amendment to the IMA.</p> <p>The Data Business Owner/Custodian must negotiate any modifications with the NB-IRDT Research, Evaluation & Training Manager, Data Transfer Coordinator, and Privacy Officer.</p> <p>The NB-IRDT Research, Evaluation & Training Manager, Data Transfer Coordinator, and Privacy Officer facilitate and provide the necessary amendments to the Information Manager. This may include an</p>	<p>Data Business Owner/Custodian</p> <p>NB-IRDT Research, Evaluation & Training Manager</p> <p>NB-IRDT Data Transfer Coordinator</p> <p>NB-IRDT Privacy Officer</p>

	<p>Agreement and Statement of Work if required.</p> <p>The NB-IRDT Data Transfer Coordinator informs the NB-IRDT Senior Data Analyst of the necessary modifications.</p> <p>The NB-IRDT Data Transfer Coordinator informs NB-IRDT Data Management if there are changes needed to data tracking.</p>	<p>NB-IRDT Senior Data Analyst</p> <p>NB-IRDT Data Management</p>
C.9 User access removed	<p>The end date for NB-IRDT Assigned Staff access is the same date as the project closure. The NB-IRDT Senior Data Analyst removes access to the project folder on this date.</p> <p>The NB-IRDT Systems Administrator removes user access to the secure facility on this date unless an appropriate amendment is in place or the user has other active projects to work on.</p>	<p>NB-IRDT Senior Data Analyst</p> <p>NB-IRDT Systems Administrator</p>
C10. IM Project Closure	<p>At project closure, policies for data retention, return, or destruction will be followed as stated in the IMA or, if not stated the <i>NB-IRDT Record Retention & Disposition Schedules</i> will apply.</p>	<p>NB-IRDT Systems Administrator</p> <p>NB-IRDT Data Management</p>

Version	Author	Nature of Change	Date
1.0	NB-IRDT Staff	Document Creation	20171214

Version	Author	Nature of Change	Date
1.1	NB-IRDT Staff	Minor Revisions	20180627

Version	Author	Nature of Change	Date
2.0	Melanie Buyting/Donna Curtis Maillet	Major Revisions	20190809

Version	Author	Nature of Change	Date
3.0	Donna Curtis Maillet/NB-IRDT Staff	Major Revisions	20200305

Version	Author	Nature of Change	Date
4.0	NB-IRDT Staff	Major Revisions	20200710