

## Research Project Closeout Confirmation

Apple Tree Dental is committed to upholding the highest ethical standards in sharing patient data. This policy outlines the principles and practices that govern Apple Tree Dental's approach to data sharing to ensure patient privacy.

Purpose: This policy governs the sharing of patient health records (Data) generated at any of the Centers of Apple Tree Dental with Research Partners (for research and quality improvement initiatives) and Clients (for financial compensation or other benefits with for-profit organizations). Values: Apple Tree Dental's decisions regarding data-sharing with Research Partners and Clients are guided by its values of service, research, and overall alignment with its Strategic Plan.

\* Required

### Submitter Information

1. Please enter the submitter's name (first and last)

2. Please enter the submitter's email address.

3. Please enter the submitter's phone number.

## Guiding Principles:

4. Data Security and Safeguards: Apple Tree Dental ensures Technical, Physical and Personnel Safeguards with federal and state health record and research laws, regulations, and best practices to protect Data from unauthorized access, use, or disclosure, in compliance with all relevant data protection laws and regulations. \*

☐ I agree

☐ I disagree

5. Data Minimization Apple Tree Dental will only share the minimum Data necessary to achieve the specified purpose. De-identified or aggregated data will be favored whenever possible. \*

☐ I agree

☐ I disagree

6. Legitimate and Ethical Purposes: Apple Tree Dental limits its data sharing practices to Research Partners and Clients with lawful business purposes relating to healthcare, scientific research, or public health interests. Apple Tree Dental prohibits the sharing or use of Data for purposes that it deems unethical. \*

☐ I agree

☐ I disagree

7. Re-identification: Recipients of de-identified Data are strictly prohibited from attempting to re-identify individuals. Robust technical and legal safeguards against re-identification will be implemented \*

☐ I agree

☐ I disagree

8. Unauthorized Use: Apple Tree Dental asserts that Data cannot be further sold, transferred, combined with other datasets for re-identification, or used for unrelated purposes without its consent. \*

☐ I agree

☐ I disagree

9. Transparency & patient engagement: Apple Tree Dental maintains transparency and engages patients by providing explicit communication on the use of Data for research purposes, maintaining a Research FAQ, a publicly facing website for published reports, and addressing inquiries on a case-by-case basis. \*

☐ I agree

☐ I disagree

10. Oversight and Accountability Data sharing and use activities will be subject to oversight by our Research Team. We conduct regular risk assessments and audits to ensure compliance with this policy. Violations may result in penalties including termination of data sharing agreements. \*

☐ I agree

☐ I disagree

11. Patient Consent and Choice: Apple Tree Dental respects patient privacy as a fundamental right. We will only share identifiable patient data with Research Partners or Clients after consent is documented in accordance with the Minnesota Health Records Act. Patients have the right to decline participation in data sharing initiatives. \*

☐ I agree

☐ I disagree

12. Data Security and Safeguards: Apple Tree Dental ensures Technical, Physical and Personnel Safeguards with federal and state health record and research laws, regulations, and best practices to protect Data from unauthorized access, use, or disclosure, in compliance with all relevant data protection laws and regulations. \*

☐ I agree

☐ I disagree

13. Data Minimization Apple Tree Dental will only share the minimum Data necessary to achieve the specified purpose. De-identified or aggregated data will be favored whenever possible. \*

☐ I agree

☐ I disagree

14. Legitimate and Ethical Purposes: Apple Tree Dental limits its data sharing practices to Research Partners and Clients with lawful business purposes relating to healthcare, scientific research, or public health interests. Apple Tree Dental prohibits the sharing or use of Data for purposes that it deems unethical. \*

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15. Re-identification: Recipients of de-identified Data are strictly prohibited from attempting to re-identify individuals. Robust technical and legal safeguards against re-identification will be implemented \*

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☐ I disagree

16. Unauthorized Use: Apple Tree Dental asserts that Data cannot be further sold, transferred, combined with other datasets for re-identification, or used for unrelated purposes without its consent. \*

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☐ I disagree

17. Transparency & patient engagement: Apple Tree Dental maintains transparency and engages patients by providing explicit communication on the use of Data for research purposes, maintaining a Research FAQ, a publicly facing website for published reports, and addressing inquiries on a case-by-case basis. \*

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☐ I disagree

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☐ I disagree

19. Patient Consent and Choice: Apple Tree Dental respects patient privacy as a fundamental right. We will only share identifiable patient data with Research Partners or Clients after consent is documented in accordance with the Minnesota Health Records Act. Patients have the right to decline participation in data sharing initiatives. \*

☐ I agree

☐ I disagree

## Confirmation

This policy applies to all employees, contractors, and third parties receiving Data from Apple Tree Dental. We expect all recipients to adhere to ethical data principles and practices.

20. I understand and agree to the terms above. \*

☐ Yes

☐ No

21. Please type your electronic signature (First and last name.) \*

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