

Defense Health Agency
Data Sharing Agreement Application
Stages of Review

Data Sharing Agreements (DSAs) are administrative controls used by the Defense Health Agency (DHA) to document that the requested use of data managed by DHA is compliant with Federal law and implementing Department of Defense (DoD) policies. Note that the DHA Privacy and Civil Liberties Office (PCLO) does not provide data extractions or grant system access. The System Managers who grant access to data require a DSA. The DHA PCLO reviews and approves DSAs based upon compliance with Federal law and DoD policies. A DSA is requested by submitting a Data Sharing Agreement Application (DSAA).

Research Requests	Non-Research Requests
<ol style="list-style-type: none"> 1. Applicants must obtain pre-approval from an Institutional Review Board (IRB) and DoD/external Human Research Protections Program (HRPP) that authorizes data collection. 2. Applicants send an initial draft of the DSAA with supporting documentation (e.g. DSAA packet). Supporting documents include, but are not limited to: <ul style="list-style-type: none"> • IRB Approval Letter • DoD/external HRPP Approval Letter • IRB Continuing Review Approval Letter • HRPP Continuing Review Approval Letter • Study protocol • Letter of Support • Data Flow Diagram • De-Identification Plan • Data Request Templates (DRTs) • System Security Verification (SSV) 3. The assigned DSA analyst conducts an in-depth review of DSAA packet and assists in identifying any outstanding items. <i>This stage of the process often involves multiple back-and-forth communications with applicant due to incomplete application packets.</i> 4. The DSAA packet is sent to the Data Evaluation Workgroup (DEW) for data expert review. If an SSV is included, it is sent for HIPAA Security review concurrently. The HIPAA Security Expert provides a recommendation for approval or identifies required changes. 5. DEW-approved packets requesting protected health information (PHI) are sent to the DHA Privacy Board for a HIPAA review. Packets NOT requesting PHI are presented to the DHA Privacy and Civil Liberties Office (PCLO) Data Sharing Compliance Manager for review and approval. 6. Privacy Board-approved packets are then presented to the PCLO Data Sharing Compliance Manager for review and approval. 7. DSA analysts send Data Sharing Compliance Manager-approved DSAs to the applicant and government sponsor for their signatures. 8. Signed DSAs must be returned to DSA analysts and are then are presented to the PCLO Chief for final signature/execution. 9. DSA analysts send a PDF version of the executed DSA, DSAA, and approved DRT (if applicable) to the applicant and government sponsor for their records. 	<ol style="list-style-type: none"> 1. Applicants must identify the active contract between the U.S. Government and the prime contracting organization that authorizes data collection. 2. Applicants send an initial draft of the DSAA with supporting documentation (e.g. DSAA packet) to the DHA Data Sharing mailbox. Supporting documents include, but are not limited to: <ul style="list-style-type: none"> • Data Flow Diagram • De-Identification Plan • Data Request Templates (DRTs) • System Security Verification (SSV) 3. The Data Sharing Support Team assigns a DSAA number and processes each packet. 4. The assigned DSA analyst conducts an in-depth review of DSAA packet and assists in identifying any outstanding items. <i>This stage of the process often involves multiple back-and-forth communications with applicant due to incomplete application packets.</i> 5. DSAA packets requesting large amounts of data elements are sent for data expert review. If an SSV is included, the SSV is sent for HIPAA Security review concurrently. The HIPAA Security Expert provides a recommendation for approval or identifies required changes. 6. The DSAA is presented to the Data Sharing Compliance Manager for review and DHA Privacy and Civil Liberties Office (PCLO) approval. 7. DSA analysts send the Data Sharing Compliance Manager-approved DSA to the applicant and government sponsor for their signatures. 8. DSA requestors return signed DSAs to DSA analysts. Signed DSAs are then presented to the PCLO Chief for final signature/execution. 9. DSA analysts send a PDF version of the executed DSA, DSAA, and Approved DRT (if applicable) to the applicant and government sponsor for their records.

Send submissions and questions to the DHA Data Sharing mailbox at DHA.DataSharing@mail.mil.

For additional details are available on the DSAA web site at <https://health.mil/Military-Health-Topics/Privacy-and-Civil-Liberties/Submit-a-Data-Sharing-Application>.