

THE IAC BULLETIN

Updates from the Office of Internal Controls and Audit Compliance

It's SDI Week!

Do you need to submit your agreement for SDI Review? Find out!

Why do I need to submit to the SDI?

As established by the MDH Data Use Policy issued in December 2021, any agreement entered into by a MDH unit that involves the use or access of MDH data requires SDI Review. In other words, if data is being shared outside of MDH pursuant to a contract or other agreement, that contract or other agreement must be reviewed by the SDI Team. This includes data-related agreements that are required by law, statute, or grant. In the case of required agreements, the SDI Team serves in an advisory capacity and provides non-binding recommendations.

When do I need to submit to the SDI?

MDH units should submit data-related agreements to the SDI Team **prior to execution** when they are doing one of the following:

1. Entering a new agreement
2. Renewing an existing agreement
3. Revising or amending an existing agreement

What is the SDI Team looking for?

The SDI Team reviews data-related agreements for three key measures:

- Is the data on an approved system?
- Are the appropriate IT safeguards and access controls in place?
- Does the agreement comply with privacy laws?

Based on these criteria, the SDI Team will analyze the data-related agreements and make recommendations for how to best secure the MDH data involved.

SDI REVIEW TIMELINE

The SDI Team will have 30 days from the date of submission to review the data-related agreement and request any additional information needed for the review. This may include requiring vendors to complete the Security Controls and Data Survey, submit proof of a SOC 2 Type II audit, or answer questions regarding data migration into an approved system.

Do I need to submit?

If you have questions about whether an agreement requires SDI Team approval, please email the agreement to mdh.sditeam@maryland.gov. You can also learn more about the SDI review process on our website: <https://health.maryland.gov/Pages/sdi.aspx>.

How do I submit?

Stay tuned for tomorrow's bulletin on how and what to submit for your SDI review.