



Institutional Handbook of Operating Procedures Policy 09.14.12	
Section: Clinical Policies	Responsible Vice President: Executive Vice President and CEO Health System
Subject: Pharmacy	Responsible Entity: Pharmacy Services

I. Title

Vendor Compliance with UTMB Information Resources in the 340B Drug Pricing Program

II. Purpose

To establish the rules for vendor access to UTMB Information Resources.

III. Policy

Vendors play an important role in the support of UTMB's 340B Program. As such, they will hold all [Confidential Information](#) in strict confidence, safeguard its use, and not release Confidential Information without UTMB's prior written approval.

IV. Procedures

- A. [Information Resources](#) (IR) are provided for the purpose of conducting the business of the University of Texas Medical Branch at Galveston (UTMB).
- B. Electronic files created, sent, or received by vendors are considered UTMB IR.
- C. All vendors should comply with UTS 165, UT System Information Resources Use and Security Policy, and adhere to all state and federal laws and UTMB's Policies and Procedures pertaining to the protection of Information Resources and privacy of Confidential Information, as those terms are defined in UTS 165. Each vendor shall:
 - 1. Hold all Confidential Information in the strictest confidence;
 - 2. Not otherwise use or disclose Confidential Information except as required or permitted by law;
 - 3. Safeguard Confidential Information according to all commercially reasonable administrative, physical and technical standards (e.g., such standards established by the National Institute of Standards and Technology or the Center for Internet Security);
 - 4. Continually monitor its operations and take any action necessary to assure the Confidential Information is safeguarded in accordance with the terms of UTS 165; and
 - 5. Comply with the Vendor Access Requirements set forth in UTS 165.
- D. All vendor agreements must specify the information the vendor will have access to, how that information will be protected by the vendor, and that the vendor must only use UTMB's IR for the purposes specified by the agreement.

V. Relevant System Policies and Procedures

[UTS 165 Information Resources Use and Security Policy](#).

VI. Related UTMB Policies and Procedures

[IHOP - 02.19.06 - Information Resources Security.](#)

[UTMB Office of Information Security. 7.2 Vendor Access.](#)

VII. Dates Approved or Amended

<i>Originated: 04/25/2019</i>	
<i>Reviewed with Changes</i>	<i>Reviewed without Changes</i>
	02/21/2023

VIII. Contact Information

Pharmacy Services

936-494-4188