## POLICY

## PURPOSE

The primary mission of Center for International Blood and Marrow Transplant Research (CIBMTR) is to share its registry data, statistical resources, and publications developed with the support of the National Institutes of Health (NIH), the Health Resources and Services Administration (HRSA), industry collaborators, and scientific and health care community. CIBMTR will maintain a Data Release Policy ("Policy") ensuring consistent management of its data release processes.

CIBMTR is committed to the dissemination of data to support transparency and the sharing of its valuable scientific resources. Data dissemination is subject to federal policy, intellectual property considerations, and the necessary protection of the privacy and confidentiality of patients, donors, and transplant centers. The release of CIBMTR data is governed by this Policy.

## SCOPE

This Policy applies to employees and other personnel across CIBMTR functional areas and locations. The requirements of this Policy may extend to other entities and persons, pursuant to the contract.

## MATERIALS

N/A

## DEFINITIONS, ACRONYMS AND ABBREVIATIONS

| Term | Meaning |
|---|---|
| AAHRPP | Association for the Accreditation of Human Research Protection Programs |
| ASTCT | American Society for Transplantation and Cellular Therapy |
| BMT CTN | Blood and Marrow Transplant Clinical Trials Network |
| CC | CIBMTR Coordinator Center: Provides oversight for the implementation of this policy through communication and collaboration with participating transplant centers |
| CIBMTR | Center for International Blood and Marrow Transplant Research |
| CIBMTR Advisory Committee | Functions as an advisory board for CIBMTR, providing input for scientific direction, policy, and optimal use of resources |
| CIBMTR Industry Relations | CIBMTR program focusing on research support and services to commercial entities |
| CIBMTR Working Committee | Committees comprised of broad representation from the scientific community that develop clinically relevant studies focused on specific research areas |

| Term | Meaning |
|---|---|
| CIRSL | CIBMTR Information Request Services Leader |
| CITI | Collaborative Institutional Training Initiative |
| CPA | Center Performance Analysis |
| CRF | Comprehensive Report Form |
| Data Dictionary | A file or set of files that contain database metadata |
| DBtC | Data Back to Centers, a business intelligence application allowing centers access to most commonly used variables as a downloadable file and to use predefined analytics |
| DUA | Data Use Agreement |
| GDPR | General Data Protection Regulation |
| HCT | Hematopoietic Cell Transplantation |
| Honest Broker | The entity receiving PII from another entity for the purposes of matching subjects common to data sources held by each entity and creating dataset containing matched data |
| HRPP | Human Research Protection Program |
| HRSA | Health Resources and Services Administration |
| IBMTR | International Bone Marrow Transplant Research |
| IRB | Institutional Review Board: A committee that has been formally designated to approve, monitor, and review biomedical and behavioral research involving humans |
| MCW | Medical College of Wisconsin |
| NIH | National Institute of Health |
| NMDP | National Marrow Donor Program |
| PHI | Protected Health Information |
| PII | Personally Identifiable Information |
| PI | Principal Investigator |
| Protocol | Detailed plan of a medical treatment or procedure |
| RDB | Research Database |
| RFI | Request for Information |
| SAS | Statistical Analysis Software |
| Senior Leader(s) | Upper management from CIBMTR responsible for making primary decisions regarding the management and compliance of CIBMTR policies |
| SOP | Standard Operating Procedure |
| SOW | Statement of Work |
| TED | Transplant Essential Data |

## RESPONSIBILITIES

It is the responsibility of each CIBMTR employee to review, understand, and comply with this Policy.

CIBMTR, in coordination with the Medical College of Wisconsin (MCW) and NMDP are responsible for adhering to the Policy. Each functional area's Senior Leader, or such person's designee must:

- Implement data release practices to make this Policy operational;
- Educate staff within the functional area in understanding data release procedures;
- Ensure datasets are created, released, destroyed, or returned per applicable agreement terms;
- Release of only de-identified or limited datasets that are compliant with applicable requirements, laws, and regulations.

## POLICY

### APPLICABILITY

CIBMTR manages one of the world's largest cellular therapy research registries and its database is a unique information resource for clinicians, researchers and the public interested in hematopoietic stem cell transplant (HCT) and adoptive cellular therapies (ACT). CIBMTR provides broad access to and use of its data. This Policy on data sharing applies to the following datasets:

Dataset Categories:

Publicly available data;
Customized requests for data and analyses;
Requests to conduct a CIBMTR study;
Requests for CIBMTR datasets from previous research;
Center requests for data;
Industry Datasets for Other CIBMTR Research.

### IMPLEMENTATION

The process for managing data request and timelines for completion vary depending on the type of request, complexity, need for statistical review, and available external funding. The implementation approach for sharing datasets by type is defined below.

1. Publicly Available Data

   Primary requestor(s): Researchers, doctors requesting data for patient care, and members of the public.

   CIBMTR regularly publishes data in a variety of report formats and makes these data available through CIBMTR, NMDP, and Health Resources and Administration (HRSA) websites,supp or upon request.

   Examples of information readily available include the annual CIBMTR Summary Slides and Stem Cell Therapeutic Outcomes Database (SCTOD) information made available through

the HRSA website (e.g., *Transplant Activity Report and Dataset)*. These data are provided as reports and created to support both research as well as general informational uses.

When appropriate, CIBMTR publishes de-identified datasets supporting publications. A listing of publications and supporting datasets are available at www.cibmtr.org. In certain instances, and due to obligatory embargos or international regulations, certain data may not be made publicly available. See **POL-0002 Data Use and Processing Policy** and **SOP-0119 Shared Publication** for more information.

2. Customized Requests for Aggregate Data, Datasets and Analyses

Primary requestor(s): Principal Investigators (PI's), members of the pharmaceutical and biotech industry and federal agencies

Requests that cannot be addressed using existing reports require a customized response. Reasons for these requests include self-education and decision making, grant support, clinical trial feasibility planning, market assessment, patient counseling or clinical decision making, professional presentation support, and center assessments. Requests range from simple queries of patient, disease, and treatment frequencies to those with greater complexity involving specific data combinations and / or statistical analysis of outcomes. CIBMTR receives these requests by email or via the online Custom Information Request Form, available on its website.

When a request requires substantial statistician and Scientific Director effort or if the request is for a newly-created custom dataset the requestor may be requested to provide additional detail for approval and prioritization by CIBMTR's Executive Leadership team or may be advised to submit a study proposal to a CIBMTR Working Committee for approval and prioritization. Requests related to the Blood and Marrow Transplant Clinical Trials Network (BMT CTN) are referred to the BMT CTN Steering Committee for approval. Requests from industry follow the guidelines of CIBMTR's Industry Relations Program.

3. Requests to Conduct a CIBMTR Study

Primary requestor(s): PIs

The most common request to access CIBMTR data and statistical resources is through submission of a study proposal to the CIBMTR Working Committee. Information on how to propose a study is on the CIBMTR How to Propose a Study webpage. A list of previously published CIBMTR research, studies that are in progress, and copies of data collection forms are available on CIBMTR Data Collection Forms webpage; investigators are encouraged to review these before submitting a proposal.

CIBMTR Working Committee members evaluate new proposals based on their scientific merit and feasibility as well as CIBMTR's ability to complete the study in a reasonable period. Feedback from CIBMTR Working Committee members at the annual meeting is considered in deciding the relative merits of proposals. Final decisions regarding which studies to pursue are made by CIBMTR Working Committee leadership and CIBMTR Advisory Committee. Proposals may also be submitted for review by committee leadership between meetings and may be assigned resources if deemed to be of high impact and timeliness.

In general, CIBMTR provides resources necessary for approved studies including statistical and data management support. However, in certain instances, a PI's institution/team may request to conduct the study analyses. When approved by Working Committee leadership, a study specific dataset may be provided under a Data Use Agreement (DUA), and the statistical analyses handled by the PI's institution. In these cases, the statistical analysis plan and results are reviewed by CIBMTR under standard study oversight procedures..

4. Requests for non-public CIBMTR Datasets from Previous Research

   Primary requestor(s): PIs

   CIBMTR supports requests to conduct independent analyses with datasets assembled for previously published studies or other existing datasets that are not automatically made publicly available. Dataset requests are considered based on scientific merit and data availability. These requests are for external use of the data and will not require CIBMTR statistical resources to conduct the proposed analyses. CIBMTR receives these requests by email or via the online Custom Information Request Form. The requestor is asked to provide a description of the study for consideration by the CIBMTR Executive Leadership team, or they may be advised to submit a study proposal to a CIBMTR Working Committee for approval, prioritization and oversight. When approved, these datasets require review and revision before they can be provided to the requestor, **including removal of all potential patient, donor, and center identifiers**, and are accompanied by a data dictionary when distributed. CIBMTR has relevant policies and procedures for creating, validating, and sharing de-identified datasets. Finally, any non-public dataset is released under a Data Use Agreement signed by both parties, e.g. CIBMTR and the recipient. See **SOP-0069 Data Sharing to Non-MCW or Non-NMDP Employees, SOP-0119 Shared Publications**, and/or **SOP-0236 Joint CIBMTR/EBMT Research Studies** for more information.

   Participating CIBMTR centers are directed to use CIBMTR Portal Applications, like DBtC (see f below) to retrieve most used Transplant Essential Data (TED) and Comprehensive Report Form (CRF) level data submitted to CIBMTR, quality checked and extracted from its research data storage.

   Dataset's released to industry partners follow the Guidelines of CIBMTR's Industry Relations Program.

5. CIBMTR Portal Data Sharing Applications

   CIBMTR shares data for self-service access with a community of diverse stakeholders—including centers, other registry consortia, cord banks and industry partners-- on the CIBMTR Portal, which facilitates secure access to data sharing utilities and applications, like Data Back to Centers (DBtC), Data for Request for Information (RFI), Center Performance Analytics (CPA) and PartnerShare, among others. Data is updated and released within these applications on scheduled, recurring basis. Access to the portal applications requires preauthorization by CIBMTR as well as multifactor authentication.

   - **DBtC** provides centers with secure, self-service access to their most used data, including descriptive statistics and outcomes. In addition, the DBtC user interface and visualizations support features that include CAR-T patient and infusion data, including demographics, indications for therapy, product information, outcomes, and

a Risk Evaluation & Mitigation Strategy (REMS) report. Data is updated on DBtC monthly.

- **RFI** provides US centers with the ability to access, view, export, and reconcile data previously submitted to CIBMTR to fulfill the center's annual obligation to share outcomes data with third-party payers and external organizations in a standard reporting format established by the ASTCT. Data for RFI is not a report but a data extract of their own data—updated annually--that centers can export to Excel in the American Society for Transplantation and Cellular Therapy (ASTCT) standard format.
- **CPA** supports HCT center performance and quality analysis leveraging the dataset from the Transplant Center-Specific Survival Analysis. CPA is updated annually.
- **PartnerShare** provides industry partners and research collaborators with self-service access to limited, de-identified data based on specific protocol criteria and only under contract with CIBMTR. Data is updated monthly.
- **Cord Blood Dashboard** provides cord blood banks with secure, on-demand access to Cord Bank Quality Reports on the safety and quality of distributed units. These reports may be downloaded in Excel and include chimerism, data quality, submitted query totals, new units included, and those units excluded in a given period, as well as any AEs reported. These reports are updated quarterly.

6. Use of Industry Datasets for Other CIBMTR Research

Primary requestor(s): PIs

CIBMTR produces clean, analysis-ready datasets in SAS format for use in industry studies. CIBMTR will support use of these datasets through a Working Committee proposal or through a Project Intake Request (PIR) for external use of CIBMTR data. Requestors are asked to submit a study proposal, either through a CIBMTR Working Committee or through the PIR process. This proposal should include a description of the population, list of variables requested, and a statistical analysis plan. The dataset provided will include a standardized list of variables (See **SOP-0119 Shared Publication Datasets, Appendix A**) in addition to variables needed for study analysis.

If the dataset is used as part of a Working Committee study, CIBMTR will generally provide statistical support. However, in certain circumstances, a PI's institution/team may request to conduct the study analyses. When approved, a study-specific dataset may be provided, and the statistical analyses will be handled by the PI's institution. In these cases, the statistical analysis plan and results are reviewed and revised by a CIBMTR biostatistician prior to sharing to confirm that all patient, donor, and center identifiers are removed, that data fields with small sample sizes (total population < 20) are not made available, and that any contractual data restrictions are adhered to. Datasets will be accompanied by a data dictionary. A Data Use Agreement (**Form-0080 CIBMTR Data Use Agreement Template**) must be on file before CIBMTR will share a dataset externally.

## DATA DOCUMENTATION AND FORMAT

Each data set request is accompanied by documentation (e.g., Data dictionary, SOW, study protocol) to ensure that describe intended use of the dataset and to prevent misuse and misinterpretation. Datasets are prepared with SAS statistical software and contain a standard set of essential data with pre-defined categories in an agreed upon file format (e.g., SAS, Excel). A data dictionary defining each variable, valid values and labels accompanies the

dataset. Other file formats can be provided upon request. In addition, CIBMTR Information Request Services Leader (CIRSL) may be engaged to address questions at inforequest@mcw.edu. **SOP-0065 Information Requests** addresses management of information requests.

## TIMELINESS OF DATA SHARING

CIBMTR creates new datasets on a timeline consistent with the complexity of the data required, available resources to prepare the data and investigator timelines. Please see the table below for average response times based on data request type.

**Timelines by Data Request Type**

| Data Request Type | Average Response Time |
|---|---|
| Publicly Available Data | As available or upon request and at the time of publication without any embargo or no later than after the journal embargo policy |
| Customized Requests for Data and Analysis | 1 to 4 weeks |
| Requests to Conduct a CIBMTR Clinical Outcomes Study | Dependent on standard process timelines as well as Working and Advisory Committee meetings |
| Requests for CIBMTR Datasets from Previous Research | In general, 3 to 6 weeks but dependent on complexity and availability of data |
| Data Back to Center Application (DBtC) | Center Data Request<br>Data Request for Information<br>Real-time access with DBTC/Data for RFI or approximately 1 to 2 weeks if custom |
| PartnerShare | Real-time access by authorized non-Center partners. |

Investigators who request datasets that directly overlap with a study in progress will be notified immediately, may be invited to participate in the ongoing study accordance with generally accepted authorship practices and will be informed the dataset will be available following publication.

## HUMAN SUBJECTS AND PRIVACY ISSUES

CIBMTR releases only de-identified or limited datasets that comply with relevant US and international requirements and regulations regarding privacy and confidentiality.

7. Human Research Protection Program

   NMDP maintains a comprehensive Human Research Protection Program (HRPP) to ensure that the rights and welfare of participants in its research are protected and to ensure compliance with all pertinent US federal regulations. NMDP Human Research Protection Program is accredited by the Association for the Accreditation of Human Research Protection Programs (AAHRPP). Under an Institutional Review Board (IRB) Authorization Agreement between MCW and NMDP, the NMDP IRB serves as the IRB of record for all research conducted by CIBMTR. The NMDP IRB has the authority to

approve, require modifications in, or disapprove all research activities within its jurisdiction as specified by both federal and state regulations and NMDP policies and procedures. As part of the CIBMTR human research protection program, all CIBMTR staff members are required to complete initial and continuing education and training in the protection of human subjects through the Collaborative Institutional Training Initiative (CITI).

8. Data Privacy

CIBMTR is obligated to ensure that data sharing does not contain Personally Identifiable Information (PII), or Protected Health Information (PHI). CIBMTR staff follow a standard procedure for de-identification for its datasets and data sharing via DBtC that specifies removal of all patient, donor, and center identifiers, which could lead to the identification of a patient or transplant center from data files (See **SOP 0069 – Data Sharing to non-CIBMTR or non-NMDP employees** for more information). CIBMTR does not release to the requestor or any other member of his / her research team identifiable patient or center variables unless these data are critical to the approved study / project or will be used for linking to another data file via an established honest broker relationship. In these cases, special procedures are outlined in the **SOP-0100 Approval to Disclose PII for Linking or Computerized Matching Person Data to External Data Sources Procedure** and documented with CIBMTR's Data Use Agreement (DUA), the *Letter of Commitment to Complete CIBMTR Observational Studies*, and established prior to final approval of the request. CIBMTR is compliant with all international rules and regulations, including the General Data Protection Regulation, and does not include patient level data provided from European institutions.

In cases of an approved study or when data is requested from previous research that will not utilize CIBMTR statistical resources for analysis, the requestor must submit an DUA that specifies the requirements for using CIBMTR data before final approval of the project is offered. The DUA is provided to the requestor of data when a study protocol or statement of work has been submitted and associates the proposed use of the data with the DUA.

Unless otherwise indicated and approved by a CIBMTR Senior Leader, data released to non-government entities are de-identified with respect to patient, donor, and center identifiers. In special circumstances in which a data set is requested that may involve private or PHI that could identify a patient, a specific confidentiality and DUA will be executed, after consideration by a CIBMTR Senior Leader as described in **SOP-0100 Approval to Disclose PII for Linking or Computerized Matching Person Data to External Data Sources**. Such research must be approved by an Institutional Review Board (IRB) prior to initiation.

**Note: The CIBMTR DUA specifies commitment from the requestor and their institution for protection of privacy, prevention of unauthorized sharing of data or attempts to patients (unless previously authorized to do so), data retention periods or destruction of datasets at the completion of the proposed work (where relevant).**

## PROPRIETARY AND RESTRICTED DATA

CIBMTR shares data with the private sector (e.g., pharmaceutical and biotechnology clients) and may perform analyses under contract to private companies. Temporary data restrictions may be applied by a private sector client agreement due to the need to protect proprietary intellectual property rights. CIBMTR is committed to data transparency and retains ownership of non-proprietary data obtained in the course of these studies, with intent to share data to support the scientific community and public interest. Any agreement to data restriction will be reviewed at the time of the request by Senior Leadership and held to a minimum. CIBMTR recognizes journal restrictions to data release and will comply with those restrictions.

Upon request, CIBMTR may also restrict use of data included in certain types of projects, including ongoing clinical trials.

Restrictions are documented in the written data request and disclosed as needed.

## METHODS FOR DATA SHARING

The *CIBMTR MS Biostatistician Reference Guide* in conjunction with the **SOP-0069 Data Sharing to Non-CIBMTR and Non-NMDP Employees** enables accurate and efficient data selection, de-identification, confirmatory processes, and dataset approval. Datasets are only shared through secure file sharing solutions that support key management.

## PUBLISHING CIBMTR DATA

Authors requesting to reproduce CIBMTR figures or unpublished data, data in manuscripts, or other printed or online media must first receive permission from CIBMTR and must acknowledge use of CIBMTR's data. See **SOP-0197 Tracking and Reporting of Publications** for processes related to publications. These requests require the use of disclaimer text and completion of the Publication Permission Request Form prior to publication or presentation. A *Letter of Commitment for The Use of CIBMTR Datasets* granting the requestor permission to publish CIBMTR data includes the disclaimer text. Responses are provided to these requests within one to two weeks.

CIBMTR publications, regardless of funding source, are posted monthly on the CIBMTR website. Listings date back to inception of the registry in 1972 and include publications from both the International Bone Marrow Transplant Research (IBMTR) and the NMDP Research Department. CIBMTR governance and leadership is responsible for approval of all publication and presentation policies. Final manuscripts and presentations are reviewed to ensure protection of proprietary information and study participant confidentiality. All published work is compliant with National Institutes of Health (NIH) requirements regarding recognition of support and public access.

## SECTION 508 COMPLIANCE

Public data is posted on the *HRSA* website and these data are certified Section 508 compliant per a completed VPAT (Voluntary Product Accessibility Template).

## REFERENCES

| Document ID | Description |
|---|---|
| Form-0080 | CIBMTR Data Use Agreement Template |
| N/A | CIBMTR MS Biostatistician Reference Guide |
| N/A | Letter of Commitment to Complete CIBMTR Observational Studies |
| N/A | Letter of Commitment for The Use of CIBMTR Datasets |
| SOP-0065 | Information Requests |
| SOP-0069 | Data Sharing to Non-CIBMTR and Non-NMDP Employees |
| SOP-0100 | Approval to Disclose PII for Linking or Computerized Matching Person Data to External Data Sources |
| SOP-0119 | Shared Publication Datasets |
| SOP-0197 | Tracking and Reporting Publications |
| SOP-0236 | Joint CIBMTR/EBMT Research Studies |

| Website | Description |
|---|---|
| **CIBMTR Website** | Center-Specific Survival Analysis<br>CIBMTR Corporate Membership Program<br>CIBMTR Custom Information Request Form<br>CIBMTR Data Collection Forms<br>CIBMTR Data Request System<br>CIBMTR DBTC<br>CIBMTR How to Propose a Study<br>CIBMTR Summary Slides<br>Publication Permission Request Form |
| **HRSA Website** | Data Page > Transplant and Survival Rates<br>US Patient Survival Report<br>US Transplant Data by Center Report<br>US Transplant Data by Disease Report |

## REVISION HISTORY

| Revision | Brief Description |
|---|---|
| P0010 rev. 1 | New Policy |
| POL-0003 R02 | Document renumbered from P0010 to POL-0003.<br>Addition of International and published dataset language |
| R03 | Changed formatting, removed redundancies, corrected title changes to references, added term “limited dataset” for clarity |
| R04 | Annual review conducted; no changes required |
| R05 | Periodic review conducted; all sections updated.<br>Portal Data Sharing Applications added. |
| R06 | Updated to new format. |
| R07 | Added Use of Industry Datasets for Other CIBMTR Research as a dataset category and implementation. |
| R08 | Added requirements for new custom datasets.<br>Revised requirements and review process for approved studies.<br>Updated process for requesting and approving independent analyses using previously published, non-publicly available datasets, including the request submission and approval process. |

## ADDENDA

N/A