CARRA Data and Sample Sharing Policy

A. Background

CARRA embraces data sharing for research purposes and dissemination of research results as a core guiding principle. As such, this document is provided as a framework on how investigators may access clinical data and/or biospecimens collected through CARRA-sponsored research. It is intended to be easy to understand, transparent, and equitable.

Details regarding what data and samples are available for requests and instructions on how to apply (including the application and link to the online data and sample share application submission site) are posted on the Data and Sample Share Page of the CARRA Research Portal, which you can access at https://research.carragroup.org/en/requests/data-and-sample-share.

Applications must include a CARRA member as a Principal Investigator (PI) or contributing collaborator. For certain substudies funded by U.S. federal organizations (e.g., NIH or CDC) that are subject to additional data sharing requirements, the CARRA member may function as a sponsoring, rather than contributing, collaborator for the application. Individuals or organizations interested in applying for access to CARRA data and/or samples who do not have a collaborative relationship with a CARRA member should contact CARRA by emailing research@carragroup.org to discuss opportunities for individual investigator collaborations and/or collaborating organization research agreements.

Investigators are expected to publish peer-reviewed manuscripts based on their analyses of CARRA data and sample requests. CARRA encourages data sharing applicants to take advantage of CARRA-sponsored funding mechanisms that provide statistical and other analytical resources, as well as open-access publication fees, for studies that lead to high-impact publications utilizing CARRA-sponsored research data and samples.

B. Scope

This policy governs usage of all data and samples collected through CARRA-sponsored research, as well as any data and/or samples from other researchers who elect to delegate sharing of these to CARRA under this policy. Data and samples within scope of this policy are those derived from studies that fall into one or more of the following categories:

1. The CARRA Registry, including the current CARRA Registry (2015-present) and the CARRA Legacy Registry (2010-2015), including all CARRA Registry substudies.
2. All Consensus Treatment Plan (CTP) studies.
3. All other CARRA-sponsored clinical and/or observational trials, including APPLE, RAPPORT, and TREAT.
4. Studies funded, endorsed, or otherwise supported in full or in part by CARRA, including CARRA-Arthritis Foundation grants and any other studies that make use of any CARRA infrastructure and/or resources.
5. Other studies, not encompassed within the prior categories, whose principal investigators elect to utilize CARRA to share their study data and/biospecimens under this CARRA policy.

C. The CARRA Data, Sample, and Publications Committee (DSPC) is responsible for evaluating requests for CARRA data and samples on behalf of CARRA. Data and samples that are collected for specific studies that are ongoing may not be available until the study has been

completed and the study PI releases the data and samples (typically after the study is done and the primary manuscript has been published).Types of Requests

1. Requests for data and/or samples to be used for research and/or publication. Submission of a full application and DSPC approval is required. If the applicant is also PI at the site where the requested data originated and requests data from the PI's own site only (i.e. same-site data sets with no further concatenation or joint analysis to occur with data from other sites), an abbreviated application is allowed.
2. General, basic inquiries such as patient cohort counts in support of preparation for research, including preliminary / feasibility data for grant submission. Submission of a short data count request is satisfactory and formal DSPC review is not required. Results are not to be used for research and/or publication.
3. Requests for a Letter of Support. A Letter of Support from CARRA attesting to access to data and/or samples available at the time of the request can be requested within the data and sample share applications.

D. Process for Submitting Requests:

All requests for data and/or samples must be submitted online using the form available on the CARRA Research Portal (https://research.carragroup.org). Instructions, data dictionaries, and other documentation that can assist in preparing applications are available.
Additional assistance in completing applications is also available via email, phone, and online conference – please email research@carragroup.org for assistance.

In order to review requests in a timely manner, CARRA accepts requests on a rolling basis. Applicants should allow adequate time for the request review, which takes 3-5 weeks for data requests and 5-7 weeks for sample requests. Additional time will be required to arrange for preparation and transfer of approved data and sample requests. Complete details of application questions and requirements are posted on the data and biospecimen application webpage and the CARRA Research Portal.

The online application requests the following information:

1. Principal investigator/project lead contact information
    i. NIH Biosketch for PI
2. Proposal details, including:
    i. Title
    ii. Lay language description
    iii. Study aims
    iv. Background, significance and innovation
    v. Preliminary data/studies/feasibility
    vi. Methods
    vii. Timeline for data analysis and publication
    viii. Authorship plan
    ix. Future directions
    x. Data sharing plan
    xi. For data requests, the PHI request type, zip-code requirements, and a list of the data fields being requested based on the study's most recent data dictionary and/or annotated case report forms (CRFs)
    xii. For sample requests, a description of the samples being requested, including the desired patient population, sample type (e.g., plasma, serum, DNA), sample timepoint(s), other desired demographic requirements and sample volume. Requestors should provide

justification for requested volume and request the minimum volume necessary to complete the project. Requestors must also provide receiving lab shipping/contact information.

- Study feasibility plan and discussion, including a sample size calculation and evidence that the investigator has appropriate resources and expertise to conduct the proposed study.

Documentation of local IRB approval or waiver for the study is required. Data and/or samples will not be released until the applicant provides documentation of IRB approval or waiver that CARRA deems acceptable. If IRB approval is not provided to CARRA within 12 months of the application approval, resubmission will be required.

E. Process for Reviewing Requests:

1. DSPC reviews. The DSPC conducts reviews once applications are complete. Decisions should be available within 5-7 weeks of receiving completed requests from CARRA staff. NOTE: This is the review time allotted for initial reviewer decision. This does not include the time required to collect all necessary documentation and time required to distribute the data and/or samples for approved applications. Applications with incomplete information, information requiring clarification, or which present meaningful overlap in topic with other applications may require further time to process and the PI or designated contact will be notified in such situations.

   At least three DSPC voting members will review each request. Members will be selected based on relevant expertise (e.g., informatics, scientific, translational, or disease-area expertise) and absence of known conflicts of interest. To ensure optimal use of CARRA data and samples, the DSPC administrator may request clarification or revisions from the submitting PI and/or solicit additional outside expertise.

2. Expedited reviews. Requests to review high-priority proposals on an expedited basis will be considered by the DSPC on a case-by-case basis. However, this is discouraged.

3. Confidentiality. Applications under review are considered confidential. In addition to DSPC members, CARRA staff and other support staff will assist with document collection, administrative review, and management of the review process.

4. DSPC decisions. The DSPC employs various criteria for evaluating, scoring, and prioritizing applications for data and samples, with the goal of providing equitable access to data and/or samples while preserving necessary and desirable prioritization to investigators who are primary contributors of data and samples. The criteria may vary depending on the category of the data and/or sample (see section B) that has been requested. Major DSPC review criteria include:
   i. Project alignment with CARRA mission
   ii. Investigators qualified to carry out proposed project
   iii. Project is practical and feasible as outlined
   iv. Requested data/samples deemed sufficient to meet the proposed project aims
   v. Assessment of project overlap with a previously approved data/sample request (posted at: https://research.carragroup.org/en/requests/data-and-sample-share). Projects deemed to have meaningful overlap may require revision acceptable to CARRA or be subject to denial.

5. Applicants will be notified by email of the DSPC decision, as follows
   A. For approved requests:
      1. Data Requests:
         a. The DSPC Administrative Lead notifies a CARRA Data Warehouse

Administrator (DWA) or other appropriate CARRA data steward or their designate(s)

b. The requestor is responsible for conferring with a DWA to ensure the dataset contains the appropriate fields. Typically, the DWA seeks to arrange an online conference with approved applicants and a member of the analysis team (e.g. statistician) prior to data release.
c. Once the release conditions are met (below), the DWA provides the dataset in the format agreed upon with the requestor.

2. Sample Requests:
    a. The DSPC Administrative Lead notifies the appropriate Biobank Lead and shares the approved proposal with them.
    b. The DSPC Administrative Lead is responsible for making contact with the Biobank Lead to ensure the appropriate samples are provided.
    c. Once the release conditions are met (see section F), the Biobank ships the samples to the requestor.

B. For requests that are not approved:
    1. The DSPC will provide the requestor with the rationale for why the request was denied.
    2. In the event that the requestor disagrees with the decision of the DSPC, he or she may appeal to the CARRA Registry and Biobank Operations Committee.

C. Posting of approved requests. In order to facilitate transparency and decrease the potential for topic overlap between investigators, all approved data and sample sharing applications will be listed on the CARRA Research Portal (https://research.carragroup.org/en/requests/data-and-sample-share). The listing will include names and institutions of the investigator(s), project title, and aims and basic request details of approved project. Unapproved projects will not be listed publicly but will be compiled for tracking and reported internally to authorized CARRA personnel.

F. Release Conditions:

1. Research compliance. Research conducted with CARRA data and samples must comply with all applicable laws, IRB policies, data use agreements, and ethical principles, as well as all CARRA policies and the institution requirements of other participating institutions. These include Health Insurance Portability and Accountability Act (HIPAA) regulations, HHS Common Rule policies, and CARRA policies on ethics and conflicts of interest. The principal investigator requesting data and/or samples is responsible for compliance (https://oir.nih.gov/sourcebook/ethical-conduct) and ensuring appropriate training and reporting by project personnel.

2. Documentation of IRB oversight. Data and samples will not be provided until documentation of appropriate IRB approval, waiver or exemption that CARRA deems acceptable is provided to CARRA. It is the responsibility of the principal investigator to provide updated documentation of IRB approval or exemption renewals, which must be continuous until the project is completed. It is the responsibility of the principal investigator to submit the documentation along with each progress report.

3. Data and Material Use agreements. Data and sample transfer must be accomplished under cover of appropriate Data Use Agreements and/or Materials Transfer Agreements

4. Authorship and publication policies. As part of the application, the PI must propose an authorship plan that appropriately recognizes the contributions of others, and complies with the CARRA publication guidelines available at https://carragroup.org/membership/policies/. The DSPC must review all resulting publications, including abstracts and manuscripts, prior to submission. Publications must credit CARRA and other relevant sponsors as determined by the CARRA Publications Policies, and for data or samples resulting from the CARRA Registry, the CARRA Registry Investigators and coordinators. Copies of published work must be sent to research@carragroup.org. Investigators are responsible for the costs of publication.
5. Progress reports. It is the responsibility of the PI to submit progress reports every 6 months following data or sample receipt until the work is published or concluded. The progress reports should be submitted online as per instructions and application form links on the CARRA Research Portal at https://research.carragroup.org/en/requests/data-and-sample-share and should include any submitted abstracts, manuscripts, presentations, or other project output since the prior progress report. The DSPC support staff will review the progress reports as they are submitted. Progress reports expressing concerns will be escalated to the DSPC, who will reach out to the investigator to provide logistics assistance to assist with project progress as needed and reasonably able. If progress reports are not submitted in a timely fashion or if the project surpasses the estimated timeline, the DSPC may (1) arrange a conference call with the PI to explore barriers to progress and a plan to improve study progress; (2) arrange a call to discuss project closure, if the project has not made progress despite an improvement plan and approval is provided by the investigator. In addition, PIs who are non-responsive to multiple requests for progress reports may be barred from participating as investigators on other data or sample requests.
6. Limitation of research to stated scope. Investigators agree to use the data and samples only for the particular scope, topics, and aims stated in the approved research project application.
7. If the PI subsequently wishes to change or broaden the approved study scope, topics, or aims, a new application, or an addendum, is required indicating any substantive changes. The DSPC encourages investigators to contact them (via email to research@carragroup.org) to clarify whether proposed changes require a new or revised application. The purpose of this policy is to provide equitable research opportunities for all interested investigators and avoid conflicting or unnecessary overlap of research topics within the CARRA research community. An investigator's usage of data or samples that is substantially out-of-scope of an application may also constitute breach of the governing Data Use Agreement or Material Transfer Agreement. Depending upon the severity of the infraction, CARRA may sanction the PI or other responsible investigators, including but not limited to imposition of restrictions on usage or publication of project work products, rescinding access and requiring immediate return or destruction of data or samples, and/or restrictions on submission and performance of other CARRA data and sample requests and projects.
8. Access to certain data and samples. Data and/or samples that are collected for funded substudies (e.g. STOP-JIA, FROST, PROMOTE, LIMIT-JIA, SMART-JIA and/or studies funded by CARRA-Arthritis Foundation grants), may not be available for release until the substudy PI has released them (e.g. after the study is complete and the primary manuscript has been published). In some situations, with the approval of the substudy PI, certain data and/or samples may be provided for approved requests on the condition that results are not released (e.g. presented or published) until the substudy has published its findings.

9. Access to sample-derived data. In order to provide equitable access to data derived from the limited supply of samples, recipients of CARRA samples agree to provide primary copies of any WES, WGS, and RNA sequencing data derived from CARRA samples back to CARRA promptly upon request, in a CARRA-approved standardized data format, at or before completion of the DSPC-approved study. On a case-by-case basis, approval of sample applications may be predicated on returning additional data derived from samples to CARRA. In all cases, investigators must provide reasonable access to such datasets to other CARRA or CARRA- approved investigators. The DSPC will adjudicate applications requesting access to such data by other investigators in a manner consistent with ensuring research advancement and in consideration of the interests of all parties.
10. Data and sample fees. If a dataset requires complex preparation, linkage, or other handling, a fee may be charged to offset costs. Additionally, samples will require payment for shipping and any certain biospecimen processing menthods, such as RNA extraction or bioanalyzer quantification and quality screenings. Applicants are encouraged to consult with CARRA staff prior to application submission if there is a question. If fees are anticipated, the PI will be advised at the time of application approval and a non-binding, good faith estimate of fees will be provided at the PI's request.

G. Additional Information

1. Policy revisions and amendments. This policy and related CARRA policies and DSPC review criteria and processes may be amended from time-to-time by CARRA and will become effective once approved by the CARRA Registry and Biobank Operations Committee (RBOC) and posted on the CARRA website .
2. CARRA-Arthritis Foundation Grants. All CARRA-Arthritis Foundation grant applications that propose to utilize CARRA data and/or samples require pre-approval from the DSPC for access to, and use of, the data and/or samples. The applicant must include a copy of the DSPC approval letter with their grant application submission. Applicants must submit their requests to the DSPC for review at least 6 weeks in advance of the grant application deadline to allow enough time for review.

   Each CARRA-Arthritis Foundation grant application is required to include a Dissemination & Data Sharing Plan that details 1) a plan for sharing results of the project through a variety of mediums; and 2) a description of how/when data sets will be shared with CARRA to be available for future research. Dissemination and Data Sharing Plans from funded CARRA-Arthritis Foundation grants will be shared with the DSPC.