CENTER FOR INTERNATIONAL BLOOD AND MARROW TRANSPLANT RESEARCH®

PROTOCOL FOR A RESEARCH DATABASE

FOR

HEMATOPOIETIC CELL TRANSPLANTATION,
OTHER CELLULAR THERAPIES AND MARROW TOXIC INJURIES

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1. Background

1.1. National Marrow Donor Program®

The National Marrow Donor Program® (NMDP) was established in 1986 as the result of a Federal contract that was awarded to create and maintain a registry of volunteer hematopoietic cell (HC) donors. Physicians search the NMDP Registry on behalf of patients in need of an HC transplant who have no suitably matching related donor. In 1999 the NMDP added a Cord Blood Registry to provide more donor source options for patients in need of an unrelated HC transplant.

In addition, the Federal contract also recognized that the NMDP could play a critical role in responding to contingency events; primarily radiation and chemical exposures occurring either accidentally or resulting from military or terrorist actions that cause a marrow toxic injury.

1.2. Center for International Blood and Marrow Transplant Research®

The International Bone Marrow Transplant Registry (IBMTR), located within the Department of Medicine of the Medical College of Wisconsin, was established in 1972 to monitor and study outcomes of bone marrow transplants. In 2004 the NMDP and IBMTR established the Center for Blood and Marrow Transplant Research (CIBMTR). The CIBMTR is a research affiliation between the NMDP and the Medical College of Wisconsin. The CIBMTR has both a Minneapolis campus located within the NMDP offices and a Milwaukee campus at the Medical College of Wisconsin. The NMDP Research Program is accomplished through the CIBMTR.

The CIBMTR has a network of more than 500 centers worldwide that contribute detailed research data on consecutive allogeneic related and unrelated and autologous hematopoietic cell transplants. In addition, NMDP centers responsible for managing unrelated donors contribute detailed data on the donation and recovery of unrelated donors. In 2011 CIBMTR activities were expanded to include uses of hematopoietic cells for regenerative medicine or immune-based therapy, including for malignancy or infection.

The CIBMTR Research Database is comprised of databases maintained at the NMDP and the CIBMTR Milwaukee campus.

1.3. Establishment and Purpose of the Research Database

The original goal of the CIBMTR Research Program is to improve the safety and effectiveness of hematopoietic cell (HC) transplantation for both donors and recipients. The NMDP database was established in 1989 and the IBMTR database was established in 1972. The Research Database contains demographic and clinical data on allogeneic related and unrelated donor and autologous HC transplants. Data
are also collected on unrelated donors and their donation experiences. The data contained in the research databases are observational data. CIBMTR does not determine which therapies are used for patients, but rather collects information regarding therapies as they are applied by transplant centers.

More recent goals of the CIBMTR Research Program are to understand uses of hematopoietic cells for regenerative medicine or immune-based therapy, including for malignancy or infection, and to improve treatments and outcomes for those individuals who have been exposed to radiation or other chemicals that are toxic to marrow. In these cases, exposure data, organ injury data, treatment data, and outcomes data are collected.

The NMDP and the CIBMTR are the sole custodians of the data in the Research Database. The NMDP and the CIBMTR are responsible for determining who has access to the data in the Research Database (see Section 6 “Studies Involving Data in the Research Database”). The NMDP and CIBMTR are responsible for determining if and when data will be removed from the database or shared with others.

The purpose of the Research Database is to have a comprehensive source of observational data that can be used to study HC transplantation as well as to have a comprehensive source of data to study the application of hematopoietic cells for regenerative medicine or immune-based therapy, including for malignancy or infection and marrow toxic injuries. Researchers whose study proposals are reviewed and approved in advance by the CIBMTR may use data for studies examining HC transplantation and its effects on recipients and donors, to study regenerative medicine or immune-based therapy, including for malignancy or infection or marrow toxic injuries. The following are types of studies in which these data may be included. Studies to determine:

- How well recipients recover from their transplants or cellular therapy;
- How recovery after transplantation or cellular therapy can be improved;
- Long-term outcomes after transplantation or cellular therapy,
- Molecular explanations for histocompatibility or clinical outcome revealed through analysis of genomic, epigenetic, or other biomolecular data
- How access to transplantation or cellular therapy for different groups of patients can be improved, including studies designed to understand the financial or economic impact of transplant or studies designed to inform insurance/government payer policy, such as U.S. Medicare policy;
- How well donors recover from collection procedures;
- Success of different treatment models for marrow toxic injury;
- The long-term effects of exposure to radiation or other chemicals;
- The application and success of transplantation in the management of marrow toxic injuries;
- The application and success of hematopoietic cells for regenerative medicine or immune-based therapy, including for malignancy or infection
Certain studies may require that data in addition to what already exists in the Research Database be collected in order to answer the research question. This protocol makes provisions for additional data collection from existing medical records (see Section 4.4 “Study Specific Data”). Section 6, “Studies Involving Data in the Research Database”, describes the process for releasing data to investigators.

2. Eligibility to Participate in the Research Database

2.1. Recipient Eligibility Criteria
Any recipient of an unrelated or related donor or autologous HC transplant (includes cells collected from peripheral blood, bone marrow or cord blood) or any recipient of cellular therapy in a CIBMTR center is eligible to participate in the Research Database. This includes adults with and without decision making capacity, and children.

2.2. Individual with Marrow Toxic Injury Eligibility Criteria
In the event of a radiation exposure accident, the NMDP has a radiation injury treatment network, whose purpose is to collect data to understand the outcomes of patients treated under these circumstances. Any individual who is treated for a marrow toxic injury at a center participating in the NMDP’s Radiation Injury Treatment Network (RITN) is eligible to participate in the Research Database. This includes adults with and without decision making capacity, and children. Eligible individuals may have received supportive care only, growth factor support, HC transplant or other appropriate medical treatment for marrow toxic injury. Treatments applied are at the discretion of the care facility, and are not determined by the NMDP or CIBMTR.

2.3. Unrelated Donor Eligibility Criteria
All donors registered on the NMDP Registry, regardless of whether they have been requested to donate a product for a recipient, are eligible to participate in the Research Database.

2.4. Informed Consent
All U.S. participants will be provided information about participation in the Research Database and must sign an Institutional Review Board (IRB) approved informed consent document indicating their consent to participate in the database. Whenever possible, patients should be informed about the protocol and asked to provide consent to participate prior to the transplant. In the rare circumstance where that is not possible, it is acceptable to obtain the patient’s consent after the transplant has occurred. Documentation of assent and of parent or legal guardian permission of minor participants, and consent for adult participants, must be maintained at the center where the participant, or their parent or legal guardian provided consent to participate. To confirm that participants have given consent to participate in the Research Database, the first form submitted on a participant includes confirmation that the participant signed the informed consent document.
Non-U.S. centers contributing data to the Research Database will provide written assurance that the submission of data to the CIBMTR Research Database has ongoing oversight by their local Ethics Review Board/Medical Ethics Committee and all national regulations are followed.

### 2.4.1. Minor Assent

The NMDP Research Database includes pediatric recipients. The procedural risk involved in this protocol meets the definition of minimal risk set forth in 45 CFR 46.102 (i) “Minimal risk means that the probability and magnitude of harm or discomfort anticipated in the research are not greater in and of themselves than those ordinarily encountered in daily life or during the performance of routine physical or psychological examinations or tests.”

Participation on this protocol requires submission of medical data from recipients that are available directly from the participant’s medical record.

Adequate provisions must be made for soliciting and documenting assent of the children and permission of their parents or legal guardians, as set forth in 45 CFR 46.408.

- The research procedures do not involve more than minimal risk; therefore assent will be sought from all minors 7 to 17 years of age capable of providing assent.
- Age appropriate information will be provided to minors 7 to 11 years of age and minors 12 to 17 years of age.
- Local Institutional Review Boards will be responsible for determining how assent will be documented.
- The research in this protocol is covered by 45 CFR 46.404; therefore the written permission of the parent or legal guardian is required.
- The minor may only participate in the research if the minor and a parent or legal guardian agree to the minor’s participation. If either the parent/legal guardian or the minor declines participation in the study, the minor shall not be enrolled in the study. If the minor lacks the capacity to provide assent, parent or legal guardian permission is sufficient.

### 3. IRB Approval Process for Research Database

All U.S. centers must have an IRB-approved protocol and consent forms prior to submitting data about transplant or cellular therapy recipients, donors, or individuals with marrow toxic injury, to the Research Database. The center’s designated IRB may not waive informed consent requirements under this protocol. Recipients, individuals with marrow toxic injury and donors must provide informed consent for submission of data to the Research Database.

Local IRB review and approval is necessary except in the case of centers that list the NMDP IRB as a designated IRB on their Federal Wide Assurance (FWA) and have an IRB Authorization Agreement in place with the NMDP that includes the Research Database protocol. This protocol and its associated consent forms are
provided to centers. Centers are required to submit this protocol and consent forms to their designated IRBs for review and approval.

International centers must follow their own national regulations and provide assurance to the CIBMTR that national regulations are being followed.

3.1. **IRB Approval Process**

- The protocol and consent forms may be modified to include the name of the local institution, local institutional contact, and to conform to other similar non-substantive format or content changes required by the center’s designated IRB.
- The modified protocol and consent forms must be reviewed and approved by the center’s designated IRB.
- Any substantive changes to the protocol or consent forms suggested or stipulated by the local IRB need to be reviewed and approved by the NMDP IRB.
- The IRB approval letter and the IRB-approved protocol and consent forms must be submitted to the IRB Office at the NMDP.
- Centers may begin submitting data for research purposes as soon as the site’s Principal Investigator receives notification from NMDP IRB staff acknowledging that an IRB-approved protocol and consent form is in place at the center.
- The above process is followed for each continuing review period. If there is a lapse in IRB approval, the center will not be allowed to submit data for research purposes until IRB-approval has been obtained.
- In cases where the center has designated the NMDP IRB on their center’s FWA, and an IRB Authorization Agreement is in place for the Research Database protocol, the center does not need to obtain any additional IRB approval.

4. **Collection of Data**

4.1. **Collection of Recipient Data**

Recipient data are collected from pre-existing data within the recipient’s medical record chart at the treatment center. Treatment Centers complete the forms at the following time-points.

<table>
<thead>
<tr>
<th>Time-point</th>
<th>Data Collected</th>
</tr>
</thead>
<tbody>
<tr>
<td>At registration</td>
<td>Name</td>
</tr>
<tr>
<td></td>
<td>Social Security Number (U.S. participants only)</td>
</tr>
<tr>
<td></td>
<td>Mother’s maiden name</td>
</tr>
<tr>
<td></td>
<td>City</td>
</tr>
<tr>
<td></td>
<td>State</td>
</tr>
<tr>
<td></td>
<td>Country of birth</td>
</tr>
</tbody>
</table>
If patient provides written consent to collect contact information, the following will also be collected:
Address
Phone numbers
Email address

At the time of transplant or cellular therapy
Demographic data such as race and ethnicity, gender, birth date, Median household income (U.S. participants only), Education (U.S. participants only), occupation
HLA typing data
Pre-transplant or cellular therapy disease-specific data such as blood counts, disease status, cytogenetics
Co-existing disease at the time of transplant or cellular therapy
Functional status
Organ function prior to transplant
History of infection exposure prior to transplant
Conditioning regimen
HSC or cellular therapy product manipulation
Quality of life

100 days, six months, one year, two year, post-transplant or cellular therapy
Engraftment – neutrophil and platelet recovery
Acute and chronic GVHD
Chimerism
Organ function
New malignancy
Disease Status
Functional status
Ability to return to work or school
Second transplant
Donor leukocyte infusion
Quality of life

Annually starting year three
Acute and chronic GVHD
New malignancy
Disease Status
Functional status
Ability to return to work or school
Second transplant
Quality of life

At time of death
Primary and contributing cause of death

4.2. **Collection of Marrow Toxic Injury Data**
Data from individuals with marrow toxic injury are collected from pre-existing data within the individual’s medical record chart at the transplant center. Treatment Centers complete the forms at the following time-points.

<table>
<thead>
<tr>
<th>Time-point</th>
<th>Data Collected</th>
</tr>
</thead>
<tbody>
<tr>
<td>At time of death</td>
<td>Primary and contributing cause of death</td>
</tr>
</tbody>
</table>
| At registration | Name  
|                 | Social Security Number (U.S. participants only)  
|                 | Mother’s maiden name  
|                 | City  
|                 | State  
|                 | Country of birth  
| At the time of initial evaluation | Demographic data such as race and ethnicity, gender, birth date,  
|                                    | Pre-existing medical problems  
|                                    | Exposure history  
|                                    | Blood counts and marrow status  
|                                    | Treatment data  
| At follow-up time points | Response to treatment including:  
|                                    | Blood counts  
|                                    | Laboratory and clinical data pertaining to organ injury  
|                                    | New malignancy  
|                                    | Functional status  
|                                    | Additional treatments  
|                                    | Other complications following the marrow toxic injury  
| At time of death | Primary and contributing cause of death  

### 4.3. Collection of Unrelated Donor Data

Unrelated donor data are collected at the time a donor joins the Registry, when a donor is requested for confirmatory typing to determine if he/she is a match with a potential recipient, during the work-up phase to determine eligibility to donate HC, and post-collection of the HC product. Donor Center staff, and in some cases Treatment Center staff (i.e., confirmatory HLA typing data), complete the forms at the following time-points and submit them to the NMDP. All data submitted are abstracted from the donor's donation record maintained at the Donor Center, the Apheresis Center or marrow Collection Center. All data are collected as part of the standard donation process.

Additionally, donor cells may be tested to determine the number and types of cells, and to test for sterility and other factors important to the transplant. Data collected during these tests may also be used for research purposes.

<table>
<thead>
<tr>
<th>Time-point</th>
<th>Data Collected</th>
</tr>
</thead>
</table>
| At the time the donor joins the Registry* | HLA typing  
|                                      | Race  
|                                      | Gender  
|                                      | Date of birth  
| At the time a donor is requested for confirmatory typing* | HLA typing (submitted by transplant center)  
|                                      | Infectious disease markers for hepatitis B and C, syphilis, HIV, CMV, HTLV I/II  
|                                      | Weight  

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<table>
<thead>
<tr>
<th></th>
<th>ABO, Rh (D^1) type</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Allogeneic blood transfusion</td>
</tr>
<tr>
<td></td>
<td>Number of pregnancies</td>
</tr>
</tbody>
</table>

**At the time of the donor work-up for HC donation**

<table>
<thead>
<tr>
<th></th>
<th>Pre-existing medical conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Infectious disease markers for hepatitis B and C, syphilis, HIV, CMV, HTLV I/II</td>
</tr>
<tr>
<td></td>
<td>ABO, Rh (D^1) type</td>
</tr>
<tr>
<td></td>
<td>Serum pregnancy test</td>
</tr>
<tr>
<td></td>
<td>Screening for hemoglobin S (sickle hemoglobin)</td>
</tr>
</tbody>
</table>

**During filgrastim injections (PBSC donors only)**

<table>
<thead>
<tr>
<th></th>
<th>Complete Blood Count</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Modified Toxicity Criteria</td>
</tr>
</tbody>
</table>

**At the time of product collection***

<table>
<thead>
<tr>
<th></th>
<th>Number and type of cells</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Sterility</td>
</tr>
<tr>
<td></td>
<td>Other product factors related to transplant</td>
</tr>
</tbody>
</table>

**Post HC collection**

- Weekly until recovery
- One month, six month post collection
- Annually

<table>
<thead>
<tr>
<th></th>
<th>Adverse events related to HC collection</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Ability to return to work, school, and leisure activities</td>
</tr>
<tr>
<td></td>
<td>Complete Blood Count (at annual follow-up only)</td>
</tr>
<tr>
<td></td>
<td>Modified Toxicity Criteria</td>
</tr>
<tr>
<td></td>
<td>Health status</td>
</tr>
</tbody>
</table>

* These data are collected as part of the search and donation process and will only be included in anonymous research studies or studies that are deemed non-human subject research by the criteria included in the October 2008 OHRP Guidance titled *Research Involving Coded Private Information or Biological Specimens*, unless the donor gives consent to participate in the Research Database at either the time he/she joins the Registry or is requested to donate for a recipient. If consent is given, these data could be used in a linked research study.

**4.4. Collection of Study Specific Data**

In addition to the standard data collected at specified time points from recipients and donors (see Section 4.1 “Recipient Data”, 4.2 “Marrow Toxic Injury Data” and Section 4.3 “Donor Data”), additional participant data may be collected as needed for a specific study. In these cases, any of the required additional data would be data that are available in the participant’s medical records. Examples of additional data that may be requested for a specific study are more detailed clinical data at time of diagnosis or more detailed disease status data post-transplant. In no cases would the recipient, individual with a marrow toxic injury or donor be contacted in order to obtain additional data without IRB approval for the specific study and IRB-approved consent from the participant for the specific study.

**5. Collaboration with Other Registries**

The CIBMTR has established collaborative relationships with the European Group for Blood and Marrow Transplant (EBMT) and EuroCord.
The EBMT, a non-profit organization based in Maastricht, The Netherlands, was established in 1974 and maintains a research database on outcomes of allogeneic and autologous transplants performed at its member centers. Like the CIBMTR, the EBMT is committed to improving the safety and efficacy of HC transplantation for both donors and recipients. To facilitate international research efforts in HC transplantation, the EBMT routinely provides data on HC transplants reported to the EBMT to the CIBMTR. Data provided by the EBMT does not include any individually identifiable data beyond birth date, location of transplant, treatment, relapse and death dates.

To evaluate cord blood transplants, the EBMT organized EuroCord, a separate European registry of cord blood recipients. The CIBMTR has an agreement with EuroCord to exchange outcomes data. The CIBMTR will provide outcomes data to EuroCord on any U.S. recipient who received a cord blood unit from a non-U.S. NetCord cord blood bank, and EuroCord will send outcomes data to the CIBMTR on any recipient who received a cord blood unit from a U.S. cord blood bank at a non-U.S. EuroCord participating institution.

CIBMTR will share data with the United States Immunodeficiency Network (USIDNET) for inclusion in the USIDNET database for use in future research as determined by USIDNET. Only data from recipients who are enrolled in both the USIDNET database protocol and the CIBMTR Research Database protocol will be exchanged with USIDNET.

The CIBMTR may also engage in discrete studies with other registries where data from subjects in both registries will be combined for analysis. In these cases subject identifiers will be exchanged with the other registry to ensure that the cases in each registry are properly linked. An example of this type of registry is the End Stage Renal Disease (ESRD) Network. Any study that will use identifiers to match subjects in another registry with subjects in the CIBMTR Research Database will require administrative approval by the NMDP IRB Chair or designated NMDP IRB member.

6. Collaborations with Other Organizations

To advance all aspects of its research agenda, the CIBMTR may enter into data sharing agreements with other organizations that allow data to be shared on participants who reside in both the CIBMTR Research Database and the collaborating organization’s database. Data sharing agreements include provisions to ensure that both the CIBMTR and the collaborating organization have obtained participant consent that allows sharing of data with other organizations as well as defining the use of the shared data and provisions to ensure that data privacy and security measures are in place to protect the data.

Each data sharing collaboration will be reviewed by the NMDP IRB Chair, or designee to determine if participant consent for the data exchange is covered by the participant’s consent to participate in the Research Database or if additional consent
must be obtained from the participant. If additional consent is required a separate consent form will be created that will be under the umbrella of the Research Database protocol. Data sharing will not be initiated until the NMDP IRB has reviewed and approved the consent form and participant consent is obtained.

Data sharing agreements entered into with collaborating organizations may include, but are not limited to, medical records claims data, genetic or genomic data, socioeconomic data or clinical data. With appropriate consent in place, data may be exchanged on any participant in the Research Database: transplant or cellular therapy recipient, NMDP member listed on the Registry or NMDP unrelated donor, or individual with a marrow toxic injury.

Data sharing examples include collaborations with healthcare performance organizations for exchange of medical record claims data or collaborations with consumer-oriented third-parties such as personal health or family genealogy companies for exchange of genetic or genomic data.

Studies initiated as a result of these data sharing agreements are included in the portfolio of research studies covered by this Research Database protocol and follow processes described in this protocol.

7. Studies Involving Data in the Research Database

7.1. Who May Request Access to Data
The data in the Research Database are available to researchers both within the CIBMTR network and outside the network. The CIBMTR defines the policies and procedures for release of data.

7.2. How Requests Are Reviewed/Approved
Any legitimate investigator may propose observational research studies to the CIBMTR. Research Database proposals are reviewed and approved by one of the CIBMTR’s scientific committees to ensure that the study is scientifically sound. If the study is scientifically sound, the NMDP IRB Chair will perform an administrative review of the study protocol to ensure that it is within the limits defined in the Research Database protocol and is covered by the participant’s informed consent document for the Research Database. Studies that fall outside the limits defined the Research Database protocol will be reviewed by the NMDP IRB. In these cases, additional consent may be required from the participant. Once the study has been approved, the NMDP IRB is informed of new studies that are added to the overall research portfolio. A data extract plan is prepared and the data necessary to conduct the study are extracted from the Research Database into a study-specific research dataset. The data extract never includes individually identifiable data beyond treatment center and treatment, relapse and death dates.
In most cases the data analysis for a study is conducted by NMDP and CIBMTR research staff in Milwaukee or Minneapolis. Data from these analyses are shared with investigators, but always as summarized, aggregate data. On the rare occasion where analysis will occur at an individual investigator’s institution, no identifying information is released beyond a randomly generated ID number (distinct from the CIBMTR ID numbers) where CIBMTR maintains the code for the random ID number. At no time is an individual investigator given the names of participants, or the identity of the center where the participant was treated. All relevant dates pertaining to a study are replaced with calculated time interval values.

7.3. Studies Designed to Inform U.S. Medicare Policy

The United States Centers for Medicare & Medicaid Services (CMS) provides expanded payment coverage for some HCT indications under Coverage with Evidence Development (CED). To qualify for coverage, transplants for these indications must take place within a CMS-approved clinical study that meets federal guidelines. CIBMTR develops prospective observational clinical studies for HCT indications under CED and submits to CMS for approval. These prospective observational studies rely only on data collected under the Research Database protocol. Patients enrolled on CIBMTR studies for indications under CED will sign a separate consent form under the Research Database protocol for participation in a CMS CED-approved study. These patients will be invited to participate in both the CMS CED study and the Research Database protocol. Patient participation in the CMS CED study is not dependent on their participation in the Research Database protocol.

8. Participant Withdrawal from the Research Database

At any time a participant may request that his or her data no longer be made available for research purposes. The participant may make this request either directly to the NMDP or CIBMTR or through his or her corresponding center.

9. Participant Contact Information

As part of the consent process to participate in the Research Database protocol, transplant or cellular therapy participants will also be asked if they are willing to provide their contact information to the CIBMTR. CIBMTR will use the contact information to invite transplant or cellular therapy participants to join studies that require direct contact with the participant (patient-reported outcomes). Each of these future studies will require NMDP IRB approval and consent from the participant specific to the study. The contact information collected at the time of consent to the Research Database protocol will only be used to invite transplant or cellular therapy patients to join specific studies and for no other purpose. Participant contact information will be stored in the same manner as other identifying participant information as described in Section 10 Data Confidentiality.
10. Data Confidentiality

Access to all information in the Research Database is tightly controlled with passwords and logins at multiple levels. Access to the Research Database is limited to those employees who have specific job responsibilities related to the database.

All paper forms containing participant information are filed in a locked area. Only those employees who have specific job responsibilities related to the files have access to the files.

Donors are assigned a donor identification (DID) number when they join the NMDP Registry. The DID contains no identifying information. This DID is used to track all donor information in the Research Database.

Recipients of transplant or hematopoietic cells for regenerative medicine or immune-based therapy, including for malignancy or infection, and individuals with marrow toxic injury are assigned a unique identification number when the treatment center registers them with the Research Database. Participant first and last name, social security number (US participants only), mother’s maiden name, and city, state and country are collected at the time the unique identification number is assigned to ensure that the participant has not been previously registered by another center. On a subset of patients that provide additional consent to be contacted directly by CIBMTR, address, phone number and email address will also be collected. These identifying data are stored in a secure table that can only be accessed by two authorized individuals. These identifying data are never included in data sets for analysis. The unique identification number contains no identifying information within it. This number is used to track all information about the participant in the Research Database.

The identity of participants in the Research Database is kept confidential at all times. Identifying information that is kept in the Research Database for recipients includes transplant date, birth date, and location of transplant. Identifying information that is kept in the research database for individuals with marrow toxic injury includes, exposure date, birth date, location of treatment. Identifying information that is kept in the research database for donors is birth date, donor center, and date and location of HC collection. Data released to investigators outside the CIBMTR does not include identifying data such as birth date and location of treatment.

The Research Database protocol is covered by a National Institutes of Health Certificate of Confidentiality (CoC) The CoC protects identifiable research information from forced disclosure in any civil, criminal, administrative, legislative, or other proceeding, whether at the federal, state, or local level.

All research staff at the CIBMTR and the NMDP maintains up-to-date training in protection of human subjects. This training is received through the Collaborative IRB Training Initiative (CITI) program. This is a web-based training program offered through the University of Miami.
Additionally, NMDP maintains appropriate technical and organizational measures for the adequate protection of the security and privacy of its systems and data. These protections comply with the United States National Institute of Standards and Technology, Security Controls for Federal Information Systems (NIST 800-53), and all other applicable security and data privacy requirements. These safeguards are audited annually by a qualified independent auditor; results are reported to CIBMTR management for timely resolution.