MTN Manual of Operational Procedures (MOP)

Section 21: Ancillary Studies, Secondary Data Analyses and Requests for Datasets

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21. OVERVIEW: ANCILLARY STUDIES, SECONDARY DATA ANALYSES AND REQUESTS FOR DATASETS

Any investigator proposing research that makes use of data, biological specimens or other information from a Microbicide Trials Network (MTN) study must first notify the MTN LOC (Pitt) Coordinator prior to initiation. This research includes the following:

 Ancillary study: An investigation not described in the original protocol that requires new data collection or additional lab sample analyses.

Note: MTN-funding will no longer be available to support new ancillary studies. Beginning Dec. 01, 2023, new ancillary studies will be restricted to:

- o Site investigators using the data and study samples from their own sites and/or
- Investigators with their own non-MTN funding.

Investigators should submit their proposals to the MTN LOC (Pitt) Coordinator prior to initiation.

 <u>Secondary data analysis</u>: An analysis by the Statistical and Data Management Center (SDMC) of existing qualitative and/or quantitative study data collected in an MTN study for the purposes of writing an abstract, manuscript or other scientific publication and/or for presenting at a meeting or conference by an investigator not on the protocol team.

Note: MTN-funding will no longer be available to support data analyses for investigations not described in the original protocol. Beginning Dec. 01, 2023, these dataset analyses will be restricted to:

- o Site investigators using the data and study samples from their own sites and/or
- o Investigators with non-MTN funding.

Investigators should submit their proposals to the MTN LOC (Pitt) Coordinator prior to initiation

• Release of MTN dataset: A request for data by a researcher who wants to conduct his or her own analysis. This does not apply to dataset releases for purposes of conducting protocol-specified primary /or secondary endpoint analyses [for example, Audio/Computer Assisted Self Interview (A/CASI) dataset releases to the MTN Behavioral Consultant. It also does not apply to dataset releases to study sponsors for purposes of regulatory submissions (e.g., for preparation of Clinical Study Reports).

Note: Requests for dataset releases for protocol-specified primary and/or secondary endpoint analyses should normally follow the publication approval process, as described in Section 20 of this Manual.

Note: MTN-funding will no longer be available to support the release of datasets for investigations not described in the original protocol. New dataset releases will be restricted to:

- Site investigators using the data and study samples from their own sites and/or
- Investigators with non-MTN funding.

Investigators should submit their proposals to the MTN LOC (Pitt) Coordinator prior to initiation.

Prior to Dec, 01, 2023, the purpose of the review and approval process (outlined in Table 21.1) for ancillary studies, secondary data analysis requests and requests for datasets was to ensure that MTN and Clinical Trials Unit (CTU) resources were used appropriately and that the rights and well-being of human subjects were protected in accordance with the U.S. Code of Federal Regulations (CFR), 45 CFR 46, which can be accessed at the following website: http://www.hhs.gov/ohrp/humansubjects/guidance/45cfr46.html.

After Dec. 01, 2023, no approval process is required. However, the MTN LOC (Pitt) Coordinator must be notified prior to initiation. The Coordinator will track the publications and communicate any apparent overlap. Authors are still required to adhere to the requirements of Section 20 of this Manual.

Any MTN investigator or non-MTN investigator may propose an ancillary study, a secondary data analysis or request a dataset. The investigator is responsible for ensuring that all necessary regulatory and administrative approvals are obtained and all relevant MTN and NIAID/DAIDS procedures are followed.

The proposed source(s) of funding must be specified in the Ancillary Study Application, Secondary Data Analysis Request Form, or Dataset Request Form (available at: https://mtnstopshiv.org/resources)..

Please refer to Table 21.1 and Figure 21.1 below to determine the appropriate process to follow for each type of request as well as its corresponding section within this manual.

Table 21.1. Applicable MOP Sections for MTN Data Publication, Ancillary Study, Secondary Data Analysis, and Dataset Requests

Type of Request	Publication Process (MOP Section 20)	Ancillary Study Request Process (MOP Section 21.1)	Secondary Data Analysis Request Process (MOP Section 21.2)	Dataset Request Process (MOP Section 21.3)
Are you requesting SDMC analysis of study data and are a member of the study Protocol Team?	X			
Are you requesting SDMC analysis of study data, but are <u>not</u> a member of the study Protocol Team?			X	
Are you requesting approval for new data collection, data abstraction from participant records (for data that is not in the study database), or additional analyses done on lab specimens?		Х		
Are you requesting a dataset (no analysis by SDMC needed) for purposes of conducting protocolspecified primary and/or secondary endpoint analyses (e.g., A/CASI dataset releases to the MTN Behavioral Consultant)?	X			
Are you requesting a dataset (no analysis by SDMC needed) to conduct your own analyses <i>outside</i> of what is specified in the protocol for primary and secondary endpoint analyses?				х

SECONDARY DATA ANALYSIS REVIEW PROCESS ANCILLARY STUDY CONCEPT REVIEW PROCESS and DATASET REQUEST REVIEW PROCESS Investigator completes application and Investigator completes application and submits to LOC (FHI 360) CRM submits to LOC (FHI 360) CRM NOT APPROVED OUESTIONS/ Request does not LOC (FHI 360) CRM initiates tracking and LOC (FHI 360) CRM initiates tracking COMMENTSFOR submits application to Protocol Chairs and ther and submits to Protocol Chair and move forward INVESTIGATOR (comments sent comments sent to to Protocol Team for review then Team for review to investigator by investigator who LOC (FHI 360) can revise and resubmit CRM) STOP Protocol Team/PPC review NOT LOC (FHI 360) CRM or Protocol Team/PPC Review SDMC to provide workload and APPROVED Protocol Chair notifies cost assessment at this time Investigator APPROVED APPROVED Working Group Reviews MTN Leadership Review (LC, LOC, SDMC PIs) STOP QUESTIONS/ Protocol Chair Final LOC (FHI 360) CRM or COMMENTS FOR Review and Approval to NOT Protocol Chair notifies Submit to LOC APPROVED Investigator APPROVED LOC (FHI 360) CRM sends Application and major comments from working groups and team to MTN LOC (Pitt) Dir. Ops for Cost/Workload LOC (Pitt) Dir. Ops sends to LC and SDMC who provide workload/cost assessment POSSIBLE OUTCOMES: Application with working group and team notes APPROVED, NOT APPROVED, APPROVED with MODIFICATIONS Notification of results of SC review provided to LOC (FHI 360) CRM, SDMC; LOC (FHI 360) CRM to notify + workload/cost assessment sent to MTN LOC (Pitt) Admin Mgr for SC review Protocol Chair and investigator

Figure 21.1. Flowchart of Ancillary Study Concept Review, Secondary Data Analysis Review, and Dataset Request Review Process (Prior to Dec. 01, 2023)

21.1 Ancillary Studies

Ancillary studies are defined as investigations that are not described in the original protocol and require additional data collection or sample analyses to be performed. They can be either retrospective or prospective in nature. Examples of ancillary studies include: studies that require analyses of biological specimens or the collection of additional specimens; or the administration of behavioral surveys, interviews or focus group discussions.

21.1.1 MTN Review and Approval of Ancillary Studies (Administrative)

The administrative actions for approval of an ancillary study proposal are described below. For ancillary studies involving multiple MTN protocols, the Leadership and Operations Center [LOC (FHI 360)] designates one Clinical Research Manager (CRM) to lead the process simultaneously for all applicable protocols, as outlined below.

Completion of an Ancillary Study Application: A proposing investigator must complete an Ancillary Study Application, (http://www.mtnstopshiv.org/resources). If the investigator plans to use specimens stored from completed MTN clinical trials, a MTN Materials Transfer Agreement (MTA) form (http://www.mtnstopshiv.org/resources) may also be needed once the study is approved by MTN. The MTN Ancillary Study Application requires a short description of the proposal explaining the rationale, scope of work and requirements (for example, materials, laboratory assays, statistical support, staff resources or specimen shipping), estimated costs, and proposed or potential source(s) of funding.

Proposing investigators are responsible for compiling all estimated costs and including the total budget in the MTN Ancillary Study Application. In developing this budget, the proposing investigators should obtain cost estimates from the Principal Investigator (PI) (or other lead investigator) of each collaborating organization that has been proposed to take part in the study [for example, the study sites, the MTN LOC, SDMC and the Laboratory Center (LC)]. The proposing investigator submits the completed Ancillary Study Application to the MTN LOC (FHI 360) CRM for the primary study.

Initial Review by the Protocol Team/Protocol Publications Committee (PPC): Once the proposing investigator submits the completed Ancillary Study Application to the MTN LOC (FHI 360) CRM for the primary study, the FHI 360 CRM will circulate the application to the Protocol Chair(s), and if approved by the Protocol Chair(s), to the protocol team. At this point, the MTN LOC (FHI 360) CRM will initiate tracking of the review process. The protocol team is asked to provide comments regarding the Ancillary Study Application. Ideally, the entire protocol team will provide comments, but at a minimum, comments must be received from the PPC, which includes the Protocol Chair(s), the Protocol Statistician, the DAIDS Medical Officer (MO), and any MOs assigned from other NIH institutes for those studies which include sites funded directly by those other institutes [such as the *Eunice Kennedy Shriver* National Institute of Child Health and Human Development (NICHD) for collaborative studies between the Adolescent Medicine Trials Network (ATN) and MTN].

The proposal may be discussed with the protocol team or PPC members either during a conference call or via email. The PPC decides one of three things: (i) to move the Ancillary Study Application forward in the review process, (ii) to request modifications to the application (by the investigator) or (iii) not to approve the application. If the ancillary study requires testing of biological samples, the Protocol Chair(s) and DAIDS MO ensure that the testing is within the scope of the consent form for long-term storage and possible future testing. Otherwise, specimens may not be used for the ancillary study unless additional consent is obtained specifically for the ancillary study, and this should be noted in the comments the team/PPC provides.

Documentation of this decision will be maintained by MTN LOC (FHI 360) and will follow the *MTN Good Documentation Policy* described in Section 9 of this Manual. The CRM will provide written feedback from the Protocol Team/PPC to the investigator who submitted the Ancillary Study Application.

Scientific Review by MTN Working Groups: If the PPC approves the Ancillary Study Application, the MTN LOC (FHI 360) CRM will send the completed Ancillary Study Application and written documentation of the PPC's initial review and feedback to MTN Working Groups (WGs) (the Biomedical Sciences Working Group and the Community Working Group) and to external experts, as applicable. This communication should include the PPC's assessment of the strengths and weaknesses of the application, as appropriate. Collectively, the WGs will be

offered an opportunity to provide input within a set time frame to supplement the review by the protocol team. Documentation of this review and its outcome will be maintained by MTN LOC (FHI 360) according to the *MTN Good Documentation Policy* described in Section 9 of this Manual.

Final Review by the Protocol Chair(s): The Protocol Chair(s) will make a final decision, based on the recommendations of the MTN WGs and the PPC, whether to: (i) approve the application as written and submit the Ancillary Study Application to the MTN Steering Committee (SC) for review; (ii) request that the proposing investigator make revisions and re-submit a revised Ancillary Study Application; or (iii) reject the application. Documentation of this review and its outcome will be maintained by MTN LOC (FHI 360) according to the *MTN Good Documentation Policy* described in Section 9 of this manual. The Protocol Chair(s) or the MTN LOC (FHI 360) CRM will notify the investigator of the decision.

If the Protocol Chair(s) is not willing to move the concept forward based upon input from the WGs, the Protocol Chair(s) or MTN LOC (FHI 360) CRM must communicate its decision, in writing, to the investigator who submitted the application. Documentation of this determination and communication with the investigator will be maintained by MTN LOC (FHI 360) according to the MTN Good Documentation Policy described in Section 9 of this Manual.

If the investigator is not satisfied with the decision, s/he can make an appeal to the MTN EC by notifying the MTN LOC (FHI 360) CRM, who will then refer the request to the MTN LOC (Pitt) Administrative Manager (mtnadmmgr@mtnstopshiv.org) and the MTN LOC (Pitt) Director of Operations & Fiscal.

If the Ancillary Study Application is approved by the Protocol Chair(s), the MTN LOC (FHI 360) CRM will submit the Ancillary Study Application with notes summarizing the key points of the reviews by the PPC, as well as the WGs, to the MTN LOC (Pitt) Administrative Manager (mtnstopshiv.org) and MTN LOC (Pitt) Director of Operations & Fiscal, who in turn will request a workload and cost assessment from the LC and SDMC. Once the MTN LOC (Pitt) Administrative Manager receives the requested workload and cost estimates, s/he will send these, along with the application and summary notes from the MTN LOC (FHI 360) CRM, to the MTN SC with a request that the MTN SC review and vote on the concept.

Review by the MTN Steering Committee (SC): Once the Ancillary Study Application is approved by the PPC(s), MTN Working Groups and Protocol Chair, and is submitted to the MTN LOC (Pitt) Administrative Manager (mtnadmmgr@mtnstopshiv.org), it will be added to the agenda for the next MTN SC meeting or call. At the meeting or call, the MTN SC will review the concept application and all relevant materials and vote on the application. The SC review will result in three possible outcomes: approved, not approved, or approved with modifications and guidance on next steps, as needed. The SC will also determine whether approval by a relevant Investigational New Drug (IND)-holder and/or Product Developer is required. Finally, the SC will determine the proposal's relative priority vis-à-vis other Network priorities. The outcome of this SC review will be documented and signed and dated by the MTN PI or designee. The SDMC PI, who is a member of the SC, communicates the priority ranking to the statistical staff. The MTN PI, MTN LOC (Pitt) Director of Operations & Fiscal or the MTN LOC (Pitt) Administrative Manager sends the outcome documentation to the MTN LOC (FHI 360) CRM, MTN SDMC Associate Director, and MTN SDMC (SCHARP) Program & Portfolio Manager. The MTN LOC (FHI 360) CRM communicates the outcome and relative priority to the proposing investigator and Protocol Chair(s) (even if already communicated by the MTN SC) and documents this communication.

If samples are needed to be shipped, the MTN LC PI notifies the MTN LC staff involved in the relevant MTN protocols of the approval of the study and the need to ensure that an MTA (if required) is developed and signed prior to shipment of samples. If an MTA is not required, the MTN LC staff obtains a written notice from the relevant parties of this fact.

21.1.2 Regulatory Approval for Ancillary Studies

Ancillary studies conducted with supplemental MTN funding are subject to DAIDS regulatory approval. Similar approvals also may be required by other funding agencies (for example, NICHD for collaborative studies between the ATN and MTN). Investigators will work with the MTN LOC (Pitt) Director of Operations & Fiscal or designee and DAIDS MO to determine which approvals are required, which may vary depending on the scope and nature of the study. These may include the following:

DAIDS Prevention Science Review Committee (PSRC) Review: The DAIDS MO, in collaboration with the DAIDS Deputy Director of the Prevention Sciences Program and the PSRC Chair, determines if a PSRC review is required.

Informed Consent Considerations: Proposing investigators work with the MTN LOC (Pitt) Director of Operations & Fiscal or designee and DAIDS to determine whether separate informed consent is needed, which will depend on the ancillary study's design and study procedures and the language included in the informed consent forms (ICF) for the primary study. For example, a separate ICF would be required if the ancillary study involves additional procedures, specimens or visits and/or involves risks and benefits that are different from those described in the primary study.

If the ancillary study requires a separate ICF and MTN funding is used for the investigation, the sample ancillary study ICF and protocol must be submitted to the DAIDS MO who coordinates the DAIDS reviews (typically Medical Officer and ProPep). DAIDS approval of the ICF must be obtained prior to submitting the site-specific ICFs to the responsible Institutional Review Boards/Independent Ethics Committees (IRBs/IECs). Ancillary study ICFs must comply with U.S. federal requirements, as outlined in 45 CFR 46. After DAIDS has approved the sample ICF, site-specific versions must be prepared, including translations into local languages and independent back-translations (when applicable), for submission to the responsible IRBs/IECs. Further details on this process are provided in Section 11.2 of this Manual.

Documentation of IRB/IEC Approval or Exemption: Documentation of all IRBs/IECs submissions, as well as approvals and/or determinations of exemption under 45 CFR 46, must be submitted via email to mtnregulatory@mtnstopshiv.org with a brief note as to the specific ancillary study that has been approved by the IRB/IEC.

Site-Specific Registration of Ancillary Studies: If the ancillary study uses supplemental MTN funding and requires separate informed consent, participating study sites may be required to complete protocol registration procedures with the DAIDS Regulatory Support Center (RSC). Procedures and requirements for protocol registration are detailed in the *DAIDS Protocol Registration Policy and Procedures Manual* and Section 11.3 of this Manual. For ancillary studies that require protocol registration, no ancillary study activities may be initiated until the RSC has notified the site in writing that all registration requirements have been met.

21.1.3 Monitoring Ancillary Studies

An ancillary study funded by MTN may be monitored by the DAIDS Clinical Site Monitoring Group (CSMG), if specifically requested by DAIDS. If DAIDS decides not to require CSMG monitoring of the ancillary study, other quality assurance procedures may be implemented for the study at the discretion of the proposing investigators and/or the MTN SC.

21.1.4 Management and Analysis of Ancillary Study Data

Plans for handling ancillary study data must be specified in the Ancillary Study Application. Prior to submitting the application, investigators are required to discuss plans for data collection, management and analysis with the SDMC PI (or other SDMC representative designated by the SDMC PI) to clarify what SDMC input and/or access to primary-study data will be needed. The SDMC may or may not assume responsibility for handling ancillary data.

21.1.5 Documentation of Approvals of Ancillary Studies

Copies of all MTN regulatory and IRB/IEC approvals (if applicable) must be maintained on file by the lead ancillary study investigator and by each participating study site and sent to mtnregulatory@mtnstopshiv.org, as required (see Section 21.1.2 above).

21.1.6 Requirements for Using Stored Biological Specimens

In addition to the requirements described above, specific requirements apply to ancillary studies that use stored biological specimens. These requirements apply to all MTN investigators and other staff members, as well as non-MTN investigators involved in testing specimens that are collected and stored for possible future research testing in MTN studies. Refer to Section 14.7 of this Manual for additional information. Additional requirements for use of stored specimens are as follows:

- Protocol-specified study endpoints will receive the highest priority.
- Specimens may not be used for ancillary studies until the LC and SDMC have confirmed that all protocol-specified testing for the primary study has been completed, results have been received and any associated data queries have been resolved, unless the LC and SDMC agree to an exception from this requirement.
- Prior to shipping or using specimens for an ancillary study, it must be confirmed that the
 participants consented to long-term storage and possible future research testing of the
 specimens. (See above Section 21.1.1). The SDMC provides listings of participants who
 did not consent to long-term storage and possible future testing to the LC, who works
 with sites, using these listings, to confirm consent for the samples to be used.
- An MTN MTA may be necessary if stored samples are to be shipped for the study. Once the study has been approved, the LC will work with the investigators to ensure that an MTA is in place, if required, before any samples are shipped.

21.1.7 Publication of Results of Ancillary Studies

Data analyses, presentations and publications resulting from ancillary studies will be prepared and reviewed in accordance with relevant DAIDS and MTN policies. Specifically, any abstracts or manuscripts developed using data obtained via an MTN-approved ancillary study must undergo the publication process described in Section 20 of this Manual, with the exception that no concept submission is required because the ancillary study was already approved. Specifically, the first step in Table 20.1, "Review of concept publication by PPC", is skipped.

21.2 Secondary Data Analyses

Note: This section applies <u>only</u> to proposed secondary data analyses made by investigators who are <u>not</u> on the protocol team of the protocol for which data analysis is requested. Protocol team members with proposed secondary data analyses should follow the MTN publication process, as specified in Section 20 of this Manual.

Secondary data analyses are analyses of existing qualitative and/or quantitative data collected in an MTN study to address a new research question proposed by an investigator who is not on the protocol team. These analyses are retrospective in nature, involving data that was collected previously as part of an MTN trial and that does not require additional procedures or analyses of specimens. Additional statistical support from the SDMC is often necessary. Secondary data analyses are subject to MTN's approval.

For secondary analysis requests involving multiple MTN protocols, the MTN LOC (FHI 360) designates one CRM to lead the process simultaneously for all applicable protocols, as outlined below and depicted in Figure 21.1.

21.2.1 MTN Review and Approval of Secondary Data Analysis Requests

Completion of Secondary Data Analysis Request Form: Proposing investigators must complete a Secondary Data Analysis Request Form (http://www.mtnstopshiv.org/resources). The form requires a short description of the proposed investigation explaining the rationale, objectives, methods, necessary staff and other resources, and other relevant information.

Review by the Protocol Team/PPC: The proposing investigator submits the completed Secondary Data Analysis Request Form to the MTN LOC (FHI 360) CRM for the protocol. The MTN LOC (FHI 360) CRM will send the form to the Protocol Chair(s), and if approved, to the protocol team, who are asked to provide comments. Ideally, the entire protocol team will provide comments, but at a minimum, comments must be received from the PPC. The proposal may be discussed by the protocol team or PPC members either during a conference call or via email. At this stage of review, the SDMC should provide the PPC with a workload and cost assessment for the analysis request. The PPC decides one of three things: (i) to move the request forward in the review process, (ii) to request modifications to the request (by the investigator), (iii) or not to approve the request. The MTN LOC (FHI 360) CRM will maintain written documentation of this review and its outcome and will provide written feedback from the PPC to the investigator who submitted the Secondary Analysis Request Form.

If the PPC approves the request, the Protocol Chair(s) or MTN LOC (FHI 360) CRM submits the request, the workload and cost assessment to the MTN LOC (Pitt) Administrative Manager (mtnadmmgr@mtnstopshiv.org) for review by the MTN Leadership Group.

Review by the MTN Leadership Group: After Proposed Secondary Analysis Requests are approved by the PPC, they are reviewed by the MTN Leadership Group. The MTN Administrative Manager submits the documentation and an approval form to the MTN PI for inclusion on the next MTN Leadership conference call. The MTN Leadership Group may decide to include members of the MTN SC in their review. If the MTN Leadership Group approves the request, it will determine whether approval from a relevant IND holder and/or Product Developer is required. The MTN Leadership Group will also determine the request's relative priority vis-àvis other Network priorities. The SDMC PI, as a member of the Leadership Group,

communicates the priority ranking to the statistical staff. The result of the Leadership Group's review is documented on the approval form and signed and dated by the MTN PI. The MTN PI, MTN LOC (Pitt) Director of Operations & Fiscal or the MTN LOC (Pitt) Administrative Manager communicates the outcome of the review and relative priority to the MTN LOC (FHI 360) CRM, MTN SDMC Associate Director, and MTN SDMC (SCHARP) Program & Portfolio Manager. The MTN LOC (FHI 360) CRM communicates the outcome to the proposing investigator and Protocol Chair(s).

21.2.2 Publication of Results of Secondary Data Analyses

Any presentations or publications that rely on secondary data analyses will be prepared and reviewed in accordance with relevant DAIDS and MTN policies. Specifically, any abstracts or manuscripts developed using study data obtained via an MTN-approved secondary data analysis must undergo the publication process described in Section 20 of this Manual, with the exception that no concept submission is required because the secondary analysis was already approved. Specifically, the first step in Table 20.1, "Review of concept publication by PPC", is skipped.

21.3 Requests for Datasets

Note: This section applies only to dataset requests by investigators who wish to conduct their own analyses (for example, a PhD thesis) outside of the protocol-specified primary and/or secondary endpoint analyses.

- Investigators requesting datasets to conduct their own protocol-specified primary and/or secondary endpoint analyses (e.g., MTN Behavioral Consultant analyses of study behavioral data) should follow the publication approval process, as described in Section 20 of this Manual.
- Clinical research sites that would like to receive their own site-specific datasets upon closure
 of a study should refer to Section 19.1 of this Manual.

The process by which requests for datasets are reviewed and approved is described below. For dataset requests involving multiple MTN protocols, the MTN LOC (FHI 360) designates one CRM to lead the process simultaneously for each applicable protocol, as outlined below.

For approved requests by investigators outside of the MTN that are not covered under the study Clinical Trials Agreement, a Data Transfer and Use Agreement must be in place for the SDMC to release the applicable dataset(s) to the proposing investigator. The SDMC will work directly with the proposing investigator to draft and finalize the Data Transfer and Use Agreement.

21.3.1 MTN Review and Approval of Requests for Datasets

Completion of Dataset Request Form: Proposing investigators must complete a Dataset Request Form (http://www.mtnstopshiv.org/resources). The form requires a short description of the proposed investigation explaining the rationale, objectives, methods, necessary staff and other resources, and other relevant information.

Review by the Protocol Team/PPC: The investigator requesting a dataset will submit a completed Dataset Request Form to the MTN LOC (FHI 360) CRM for the protocol. For dataset requests involving multiple MTN protocols, the MTN LOC (FHI 360) designates one CRM to

lead the process, as outlined below and depicted in Figure 21.1, simultaneously for all applicable protocols.

The MTN LOC (FHI 360) CRM will send the form to the Protocol Chair(s), and if approved by the Protocol Chair(s), to the protocol team, who are asked to provide comments. Documentation of the Protocol Chair(s) decision will be maintained by MTN LOC (FHI 360). Ideally, the entire protocol team will provide comments, but at a minimum, comments must be received from the PPC. The proposal may be discussed by the protocol team or PPC members either during a conference call or via email. At this stage of review, the SDMC should provide the PPC with a workload and cost assessment for the dataset request. The PPC decides one of three things: (i) to move the request forward in the review process, (ii) to request modifications to the request (by the investigator), or (iii) not to approve the request. The result will be documented on a form and maintained by the MTN LOC (FHI 360). The MTN LOC (FHI 360) CRM will provide written feedback from the PPC to the investigator who submitted the Dataset Request Form.

If the PPC approves the request, the Protocol Chair(s) or MTN LOC (FHI 360) CRM submits the request, the approval of the PPC, and the workload and cost assessment to the MTN LOC (Pitt) Administrative Manager (mtnstopshiv.org) for review by the MTN Leadership Group. The MTN Administrative Manager submits the documentation and an approval form to the MTN PI for inclusion on the next MTN Leadership conference call.

Review by the MTN Leadership Group: After the PPC approves the proposed dataset request, it is reviewed by the MTN Leadership Group. The MTN Leadership Group may decide to include members of the MTN SC in their review. This review will determine whether the dataset can be released and whether approval is required from a relevant IND holder and/or Product Developer. The MTN Leadership Group will also help to set priorities for the work required of the SDMC by informing the SDMC of the relative priority for this work, given other ongoing projects. The outcome of this review is included on the approval form and signed by the MTN PI. The MTN PI, MTN LOC (Pitt) Director of Operations & Fiscal or the MTN LOC (Pitt) Administrative Manager communicates the outcome of the review to the MTN LOC (FHI 360) CRM, MTN SDMC Associate Director, and MTN SDMC (SCHARP) Program & Portfolio Manager. The MTN LOC (FHI 360) CRM communicates the outcome to the proposing investigator and Protocol Chair(s). The SDMC PI communicates the priority ranking to the statistical staff. These established priorities are included in communications on the outcome of the review to the MTN LOC (FHI 360) CRM, who in turn communicates them to proposing investigator and Protocol Chair(s).

21.3.2 Publication of Results of Request for Datasets

All data analyses, presentations and publications resulting from research funded by MTN will be prepared and reviewed in accordance with relevant DAIDS and MTN policies. This includes work relying on MTN datasets. Specifically, any abstracts or manuscripts developed using study data obtained via an MTN-approved dataset request must undergo the publication process described in Section 20 of this Manual, with the exception that no concept submission is required. Specifically, the first step in Table 20.1, "Review of concept publication by PPC", is skipped.