

Application for Massachusetts All-Payer Claims Data (Non-Government) [Exhibit A – Data Application]

I. INSTRUCTIONS

This form is required for all Applicants, Agencies, or Organizations, hereinafter referred to as “Organization”, except Government Agencies as defined in [957 CMR 5.02](#), requesting protected health information. All Organizations must also complete the [Data Management Plan](#), and attach it to this Application. The Application and the Data Management Plan must be signed by an authorized signatory. This Application and the Data Management Plan will be used by CHIA to determine whether the request meets the criteria for data release, pursuant to 957 CMR 5.00. Please complete the Application documents fully and accurately. Prior to receiving CHIA Data, the Organization must execute CHIA’s [Data Use Agreement](#). Organizations may wish to review that document prior to submitting this Application.

Before completing this Application, please review the data request information on CHIA’s website:

- [Data Availability](#)
- [Fee Schedule](#)
- [Data Request Process](#)

After reviewing the information on the website and this Application, please contact CHIA at apcd.data@chiamass.gov if you have additional questions about how to complete this form.

The Application and all attachments must be uploaded to IRBNet. All Application documents can be found on the [CHIA website](#).

Information submitted as part of the Application may be subject to verification during the review process or during any audit review conducted at CHIA’s discretion.

Applications will not be reviewed until the Application and all supporting documents are complete and the required application fee is received.

A [Fee Remittance Form](#) with instructions for submitting the application fee is available on the CHIA website. If you are requesting a fee waiver, a copy of the Fee Remittance Form and any supporting documentation must be uploaded to IRBNet. Please be aware that if your research is funded and under that funding you are required to release raw data to the funding source, you may not receive CHIA Data.

II. FEE INFORMATION

1. Consult the most current [Fee Schedule](#) for All-Payer Claims Database data.
2. After reviewing the Fee Schedule, if you have any questions about the application or data fees, contact apcd.data@chiamass.gov.
3. If you believe that you qualify for a fee waiver, complete and submit the [Fee Remittance Form](#) and attach it and all required supporting documentation with your application. Refer to the [Fee Schedule](#) (effective Feb 1, 2017) for fee waiver criteria.
4. Applications will not be reviewed until the application fee is received.
5. Data for approved Applications will not be released until the payment for the Data is received.

III. ORGANIZATION & INVESTIGATOR INFORMATION

Project Title:	SHH Mental Health Risk Parity Research Initiative
IRBNet Number:	2242689-1
Organization Requesting Data (Recipient):	Silver Hill Hospital
Organization Website:	https://silverhillhospital.org/
Authorized Signatory for Organization:	Andrew Gerber, MD, PhD, President and Medical Director of Silver Hill Hospital (SHH)
Title:	President and Medical Director
E-Mail Address:	agerber@silverhillhospital.org
Telephone Number:	(203) 801-2230
Address, City/Town, State, Zip Code:	208 Valley Rd, New Canaan, CT 06840
Data Custodian: (individual responsible for organizing, storing, and archiving Data)	Meredith Pyne
Title:	Research Associate
E-Mail Address:	mpyne@silverhillhospital.org
Telephone Number:	203-461-4726
Address, City/Town, State, Zip Code:	208 Valley Rd, New Canaan, CT 06840
Primary Investigator (Applicant): (individual responsible for the research team using the Data)	Andrew Gerber, MD, PhD, President and Medical Director of Silver Hill Hospital (SHH)
Title:	Ibid.
E-Mail Address:	Ibid.
Telephone Number:	Ibid.
Address, City/Town, State, Zip Code:	Ibid.
Names of Co-Investigators:	Joel Bernanke, MD, SHH Psychiatry Research
E-Mail Addresses of Co-Investigators:	jbernanke@silverhillhospital.org

IV. PROJECT INFORMATION

IMPORTANT NOTE: Organization represents that the statements made below as well as in any study or research protocol or project plan, or other documents submitted to CHIA in support of the Data Application are complete and accurate and represent the total use of the CHIA Data requested. Any and all CHIA Data released to the Organization under an approved application may ONLY be used for the express purposes identified in this section by the Organization, and for no other purposes. Use of CHIA Data for other purposes requires a separate Data Application to CHIA **or** written request to CHIA, with approval being subject to CHIA's regulatory restrictions and approval process. Unauthorized use is a material violation of your Organizations's Data Use Agreement with CHIA.

1. What will be the use of the CHIA Data requested? [Check all that apply]

- | | | |
|---|--|---|
| <input type="checkbox"/> Epidemiological | <input type="checkbox"/> Health planning/resource allocation | <input type="checkbox"/> Cost trends |
| <input type="checkbox"/> Longitudinal Research | <input type="checkbox"/> Quality of care assessment | <input type="checkbox"/> Rate setting |
| <input type="checkbox"/> Reference tool | <input checked="" type="checkbox"/> Research studies | <input type="checkbox"/> Severity index tool (or other derived input) |
| <input type="checkbox"/> Surveillance | <input type="checkbox"/> Student research | <input type="checkbox"/> Utilization review of resources |
| <input type="checkbox"/> Inclusion in a product | <input type="checkbox"/> Other (describe in box below) | |

Click here to enter text.

2. Provide an abstract or brief summary of the specific purpose and objectives of your Project. This description should include the research questions and/or hypotheses the project will attempt to address, or describe the intended product or report that will be derived from the requested data and how this product will be used. Include a brief summary of the pertinent literature with citations, if applicable.

Silver Hill Hospital (SHH) aims to provide transparency on the status of mental health parity in New England and support advocacy for mental health insurance coverage and network adequacy. The federal government lacks the ability to effectively enforce the Mental Health Parity and Addiction Equity Act (MHPAEA) of 2008 due to diverse reimbursement mechanisms, opaque and proprietary pricing data, and lack of industry standardization. This is illustrated by the 2019 Milliman Research, which revealed that mental health inpatient, outpatient and primary care services are more than 5x as likely to be charged out-of-network compared to medical/surgical services¹. The same research also reported that in-network primary care visits are reimbursed at 20+% higher rates than Medicare benchmark rates.

MHPAEA is aimed at addressing inadequate mental health insurance coverage, but lacks sufficient oversight and penalties to drive adherence. In a step towards changing this, the Consolidated Appropriations Act (2021) required insurers to provide analyses of non-quantitative treatment limitations (NQTLs). However, the 2022 MHPAEA Report to Congress² stated that not one of the NQTL analyses performed was sufficient to show compliance with the law's requirements.

SHH's mental health parity research aims to provide transparency on mental health insurance reimbursement and network coverage in comparison to comparable physical health services. The research will culminate in a "scorecard" that will equip stakeholders with the ability to enact meaningful change for mental health.

3. Has an Institutional Review Board (IRB) reviewed your Project?

- Yes [*If yes, a copy of the approval letter and protocol must be included with the Application package on IRBNet.*]
 No, this Project is not human subject research and does not require IRB review.

4. **Research Methodology:** Applications must include either the IRB protocol or a written description of the Project methodology (typically 1-2 pages), which should state the Project objectives and/or identify relevant research questions. This document must be included with the Application package on IRBNet and must provide sufficient detail to allow CHIA to understand how the Data will be used to meet objectives or address research questions.

V. PUBLIC INTEREST

1. Briefly explain why completing this Project is in the public interest. Use quantitative indicators of public health importance where possible, for example, numbers of deaths or incident cases; age-adjusted, age-specific, or crude rates; or years of potential life lost. *Uses that serve the public interest under CHIA regulations include, but are not limited to: health cost and utilization analysis to formulate public policy; studies that promote improvement in population health, health care quality or access; and health planning tied to evaluation or improvement of Massachusetts state government initiatives.*

The opportunity to integrate APCD data with additional publically available datasets (MRFs) would allow Silver Hill Hospital to 1) identify additional paths forward to improve mental health parity and 2) support Massachusetts's path to being a leader in mental health coverage.

¹https://assets.milliman.com/ektron/Addiction_and_mental_health_vs_physical_health_Widening_disparities_in_network_use_and_provider_reimbursement.pdf

² <https://www.dol.gov/sites/dolgov/files/EBSA/laws-and-regulations/laws/mental-health-parity/report-to-congress-2022-realizing-parity-reducing-stigma-and-raising-awareness.pdf>

Mental Health Parity advocacy is critical to address the mental healthcare crisis our country is facing. More than 1 in 5 adults suffer from mental illness³ in our nation annually and yet, 1 in 4 adults with frequent mental distress do not see a doctor due to cost⁴. Specifically, 10% of adults and 8.5% of youth still have private insurance that does not cover mental health⁵.

The U.S. mental healthcare crisis not only has a devastating impact on individuals, but also on the US Economy. Depression costs US employers \$24 billion annually in lost productive work time⁶. Providing mental healthcare coverage and supporting individuals to seek mental health treatment is critical to the wellbeing of our communities and livelihood, as employees in depression remission miss 10 days less per year than those with a persistent major depressive disorder⁷.

SHH's mental health parity research serves the public's interest as it would provide analysis to assist in galvanizing support for enforcement of the MHPEA as well as other measures to expand mental health coverage and reimbursement. As a respected, independent, nonprofit psychiatric hospital, Silver Hill is uniquely positioned to make an impact based on its collective knowledge gained throughout its 93-year history, renowned mental health clinicians, intense desire to make mental health care affordable for all, and intimate knowledge of insurance reimbursement practices. Silver Hill's Initiative can help support Massachusetts, and surrounding states, to be a leader in mental healthcare policy and, as a result, have healthier, more productive residents and thriving economies.

VI. DATASETS REQUESTED

The Massachusetts All-Payer Claims Database is comprised of medical, pharmacy, and dental claims and information from the member eligibility, provider, and product files that are collected from health insurance payers licensed to operate in the Commonwealth of Massachusetts. This information encompasses public and private payers as well as data from fully-insured and self-insured plans. APCD data are refreshed and updated annually and made available to approved data users. For more information about APCD Data, including available years of data and a full list of elements in the database please refer to layouts, data dictionaries and similar documentation included on [CHIA's website](#).

Data requests are typically fulfilled on a one time basis, however; certain Projects may require future years of data that will become available in a subsequent release. Projects that anticipate a need for future years of data may request to be considered for a subscription. Approved subscriptions will receive, upon request, the same data files and data elements included in the initial Release annually or as available. Please note that approved subscription requests are subject to the Data Use Agreement, will require payment of fees for additional Data for Non-Government Entities, and subject to the limitation that the Data can be used only in support of the approved Project.

1. Please indicate below whether this is a one-time request, or if the described Project will require a subscription.

One-Time Request **OR** Subscription

³ Mental Health America 2024 Report, *The State of Mental Health in America* (<https://mhanational.org/issues/state-mental-health-america>)

⁴ Ibid.

⁵ Ibid.

⁶ Stewart WF, Ricci JA, Chee E, Hahn SR, Morganstein D. Cost of Lost Productive Work Time Among US Workers With Depression. *JAMA*. 2003;289(23):3135–3144. doi:10.1001/jama.289.23.3135

⁷ Simon et al., "Recovery from Depression, Work Productivity, and Health Care Costs among Primary Care Patients

2. CHIA is currently supporting requests for claims data from 2016 to 2022. Requests made outside of these years may not be supported by CHIA and will be considered on a case-by-case basis. Please specify the years of data that are being requested: _____ 2016 - 2022 _____.

3. Specify below the data files requested for this Project, and provide your justification for requesting *each* file.

<input checked="" type="checkbox"/> Medical Claims
<p>Describe how your research objectives require Medical Claims data: SHH’s mental health parity research requires understanding of insurance coverage for specific mental healthcare services and comparable physical healthcare services, therefore needing medical claims data to identify these specific services.</p>
<input type="checkbox"/> Pharmacy Claims
<p>Describe how your research objectives require Pharmacy Claims data: Click here to enter text.</p>
<input type="checkbox"/> Dental Claims
<p>Describe how your research objectives require Dental Claims data: Click here to enter text.</p>
<input checked="" type="checkbox"/> Member Eligibility
<p>Describe how your research objectives require Member Eligibility data: SHH’s mental health parity research requires understanding of network adequacy and insurance coverage, therefore presenting a need to understand which members are eligible for mental healthcare coverage.</p>
<input checked="" type="checkbox"/> Provider
<p>Describe how your research objectives require Provider data: SHH’s mental health parity research requires assessing provider coverage and distinguishing between different plan coverage.</p>
<input checked="" type="checkbox"/> Product
<p>Describe how your research objectives require Product data: We would like to better understand and discuss the scope of this data. We believe Silver Hill Hospital’s mental health parity research may have a need for this information in order to identify which specific plans provide certain levels of coverage and the timeline around any changes in coverage.</p>

VII. DATA ENHANCEMENTS REQUESTED

State and federal privacy laws limit the release and use of CHIA Data to the minimum amount of data needed to accomplish a specific Project objective.

All-Payer Claims Database data is released in Limited Data Sets (LDS). All Organizations receive the “Core” LDS, but may also request the data enhancements listed below for inclusion in their analyses. Requests for enhancements will be reviewed by CHIA to determine whether each represents the minimum data necessary to complete the specific Project objective.

For a full list of elements in the release (i.e., the core elements and additional elements), please refer to [release layouts, data dictionaries](#) and similar documentation included on CHIA’s website.

1. Specify below which enhancements you are requesting in addition to the “Core” LDS, provide your justification for requesting each enhancement.

a. Geographic Subdivisions

ZIP code and state geographic subdivisions are available for Massachusetts residents and providers only. Small population ZIP codes are combined with larger population ZIP codes. One ZIP Code per person (MEID) per year has been assigned based on the ZIP code/state reported in the member eligibility record’s earliest submission year month. If the record does not have an MEID, assignment is based on distinct OrgID/Carrier Specific Unique Member ID.

Non-Massachusetts ZIP codes and state codes except for CT, MA, ME, NH, NY, RI, and VT are suppressed.

Select one of the following options.

<input type="checkbox"/> 3-Digit Zip Codes (standard)	<input checked="" type="checkbox"/> 5-Digit Zip Codes***
***If requested, provide justification for requesting 5-Digit Zip Code. Refer to specifics in your methodology: 5-digit zip code requested for linkage to US Census Bureau Information.	

b. Date Resolution

Select one option from the following options.

<input checked="" type="checkbox"/> Year (YYYY) (Standard)	<input type="checkbox"/> Month (YYYYMM) ***	<input type="checkbox"/> Day (YYYYMMDD) *** [for selected data elements only]
*** If requested, provide justification for requesting Month or Day. Refer to specifics in your methodology: Click here to enter text.		

c. National Provider Identifier (NPI)

Select one of the following options.

<input type="checkbox"/> Encrypted National Provider Identifiers (standard)	<input checked="" type="checkbox"/> Decrypted National Provider Identifiers***
*** If requested, provide justification for requesting decrypted National Provider Identifier(s). Refer to specifics in your methodology: As part of this research project, we need to match specific psychiatric service claims to institutions that provide different types and levels of psychiatric care. The revenue or procedure codes alone often do not differentiate between different types of psychiatric care. Knowing the NPI will allow us to cross reference with specific institutions and better understand whether payers are adhering to parity law.	

1. Please indicate whether you are seeking Medicaid Data:

- Yes
 No

2. Federal law (42 USC 1396a(a)7) restricts the use of individually identifiable data of Medicaid recipients to uses that are **directly connected to the administration of the Medicaid program**. If you are requesting MassHealth Data, please describe, in the space below, why your use of the Data meets this requirement. *Your description should focus on how the results of your project could be used by the Executive Office of Health and Human Services in connection with the administering the MassHealth program.* Requests for identifiable MassHealth Data will be forwarded to MassHealth for a determination as to whether the proposed use of the Data is directly connected to the administration of the MassHealth program. CHIA cannot release MassHealth Data without approval from MassHealth. This may introduce significant delays in the receipt of MassHealth Data.

Researchers must provide the following information for MassHealth to determine how the disclosure of identifiable MassHealth claims data is directly related to the administration of the MassHealth program:

- How does the project relate directly to the administration of the Medicaid program?
- What specific Medicaid program, policy, rule or law will be affected or changed based on the outcome of this project?
- How will MassHealth's objectives be helped or impaired by approving this project?
- Will the results of the research have the potential for:
 - reducing cost of the Medicaid program,
 - improving access for recipients, and/or
 - increasing quality of care to recipients?
- Please describe the project deliverables the researchers will provide to MassHealth
- Please describe how MassHealth can use the project deliverables in administration of the MassHealth program.

3. Organizations approved to receive Medicaid Data will be required to execute a [Medicaid Acknowledgment of Conditions](#). MassHealth may impose additional requirements on applicants for Medicaid Data as necessary to ensure compliance with federal laws and regulations regarding Medicaid.

IX. DATA LINKAGE

Data linkage involves combining CHIA Data with other data to create a more extensive database for analysis. Data linkage is typically used to link multiple events or characteristics within one database that refer to a single person within CHIA Data.

1. Do you intend to link or merge CHIA Data to other data?

- Yes
 No linkage or merger with any other data will occur

2. If yes, please indicate below the types of data to which CHIA Data will be linked. [Check all that apply]
- Individual Patient Level Data (e.g. disease registries, death data)
 - Individual Provider Level Data (e.g., American Medical Association Physician Masterfile)
 - Individual Facility Level Data (e.g., American Hospital Association data)
 - Aggregate Data (e.g., Census data)
 - Other (please describe): Insurance carrier publicly available machine readable files (MRFs).

3. If yes, describe the dataset(s) to which the CHIA Data will be linked, indicate which CHIA Data elements will be linked and the purpose for each linkage.

SHH mental health parity research will compare mental health and physical health services using the NPI field and zip code fields in order to complete research to promote improvement in mental health care quality and/or access. Datasets used will include the insurance carrier public MRFs, the American Medical Association Physician Masterfile and the US Census Bureau Information.

4. If yes, for each proposed linkage above, please describe your method or selected algorithm (e.g., deterministic or probabilistic) for linking each dataset. If you intend to develop a unique algorithm, please describe how it will link each dataset.

Linkage method will be deterministic.

5. If yes, attach or provide below a complete listing of the variables from all sources to be included in the final linked analytic file.

The NPI field will be linked to the American Medical Association Physician Masterfile to obtain provider information, including name and location. NPI will also be linked to the insurance carrier public MRFs. The patient zip code will be linked to Census Bureau Data to obtain country-level demographic information, including age, sex and income.

6. If yes, please identify the specific steps you will take to prevent the identification of individual patients in the linked dataset.

We will have no individual patient level data and therefore there is no danger of identifying individual patients

X. PUBLICATION / DISSEMINATION / RE-RELEASE

1. Do you anticipate that the results of your analysis will be published or made publically available? If so, how do you intend to disseminate the results of the study (e.g.; publication in professional journal, poster presentation, newsletter, web page, seminar, conference, statistical tabulation)? Any and all publication of CHIA Data must comply with CHIA's cell size suppression policy, as set forth in the Data Use Agreement. Please explain how you will ensure that any publications **will not disclose a cell less than 11**, and percentages or other mathematical formulas that result in the display of a cell less than 11.

SHH's mental healthcare research initiative may lead to research publications, but none of these would have analyses with cells less than 11. Publications will be reviewed carefully by the research team to insure this.

2. Describe your plans to use or otherwise disclose CHIA Data, or any Data derived or extracted from such Data, in any paper, report, website, statistical tabulation, seminar, or other setting that is not disseminated to the public.

The results from this research will all be made available to the public.

3. What will be the lowest geographical level of analysis of data you expect to present for publication or presentation (e.g., state level, city/town level, zip code level, etc.)? Will maps be presented? If so, what methods will be used to ensure that individuals cannot be identified?

The lowest geographical level of data represented will be at the statewide level.

4. Will you be using CHIA Data for consulting purposes?

- Yes
 No

5. Will you be selling standard report products using CHIA Data?

- Yes
 No

6. Will you be selling a software product using CHIA Data?

- Yes
 No

7. Will you be using CHIA Data as in input to develop a product (i.e., severity index tool, risk adjustment tool, reference tool, etc.)

- Yes
 No

8. Will you be reselling CHIA Data in any format not noted above?

- Yes
 No

If yes, in what format will you be reselling CHIA Data?

NA

9. If you have answered “yes” to questions 5, 6, 7 or 8, please provide the name and a description of the products, software, services, or tools.

NA

10. If you have answered “yes” to questions 5, 6, 7 or 8, what is the fee you will charge for such products, software, services or tools?

NA

XI. APPLICANT QUALIFICATIONS

1. Describe your previous experience using claims data. This question should be answered by the primary investigator and any co-investigators who will be using the Data.

SHH has recently received the Connecticut state APCD data and is in exploration phase of this new data.

2. **Resumes/CVs:** When submitting your Application package on IRBNet, include résumés or curricula vitae of the principal investigator and co-investigators. (These attachments will not be posted on the internet.)

XII. USE OF AGENTS AND/OR CONTRACTORS

By signing this Application, the Organization assumes all responsibility for the use, security and maintenance of the CHIA Data by its agents, including but not limited to contractors. The Organization must have a written agreement with the agent of contractor limiting the use of CHIA Data to the use approved under this Application as well as the privacy and security standards set forth in the Data Use Agreement. CHIA Data may not be shared with any third party without prior written consent from CHIA, or an amendment to this Application. CHIA may audit any entity with access to CHIA Data.

Provide the following information for **all** agents and contractors who will have access to the CHIA Data. [*Add agents or contractors as needed.*]

Data will not utilize outside contractors in research work with the APCD .

AGENT/CONTRACTOR #1 INFORMATION	
Company Name:	NA – not using an external organization
Company Website	
Contact Person:	
Title:	
E-mail Address:	
Address, City/Town, State, Zip Code:	
Telephone Number:	
Term of Contract:	

1. Describe the tasks and products assigned to the agent or contractor for this Project and their qualifications for completing the tasks.

NA

2. Describe the Organization’s oversight and monitoring of the activities and actions of the agent or contractor for this Project, including how the Organization will ensure the security of the CHIA Data to which the agent or contractor has access.

NA

3. Will the agent or contractor have access to and store the CHIA Data at a location other than the Organization’s location, off-site server and/or database?

- Yes
- No

4. If yes, a separate Data Management Plan **must** be completed by the agent or contractor.

AGENT/CONTRACTOR #1 INFORMATION	
Company Name:	Click here to enter text.
Company Website	Click here to enter text.
Contact Person:	Click here to enter text.
Title:	Click here to enter text.
E-mail Address:	Click here to enter text.
Address, City/Town, State, Zip Code:	Click here to enter text.
Telephone Number:	Click here to enter text.
Term of Contract:	Click here to enter text.

1. Describe the tasks and products assigned to the agent or contractor for this Project and their qualifications for completing the tasks.

Please see Dr. Gerber’s resume for qualifications.

2. Describe the Organization's oversight and monitoring of the activities and actions of the agent or contractor for this Project, including how the Organization will ensure the security of the CHIA Data to which the agent or contractor has access.

Our robust measures to prevent unauthorized access include a dynamic password policy (which we are actively changing to match NIST standards), 2FA for identity verification, and multi-factor authentication for external VPN access. Additionally, we employ CarbonBlack for MDR endpoint security and receive user log activity alerts through Managed Desktop Manager and MS Log Analytics.

3. Will the agent or contractor have access to or store the CHIA Data at a location other than the Organization's location, off-site server and/or database?

Yes

No

4. If yes, a separate Data Management Plan **must** be completed by the agent or contractor.


[INSERT A NEW SECTION FOR ADDITIONAL AGENTS/CONTRACTORS AS NEEDED]

XIII. ATTESTATION

By submitting this Application, the Organization attests that it is aware of its data use, privacy and security obligations imposed by state and federal law *and* confirms that it is compliant with such use, privacy and security standards. The Organization further agrees and understands that it is solely responsible for any breaches or unauthorized access, disclosure or use of CHIA Data, including, but not limited to, any breach or unauthorized access, disclosure or use by any third party to which it grants access.

Organizations approved to receive CHIA Data will be provided with Data following the payment of applicable fees and upon the execution of a Data Use Agreement requiring the Organization to adhere to processes and procedures designed to prevent unauthorized access, disclosure or use of data.

By my signature below, I attest: (1) to the accuracy of the information provided herein; (2) this research is not funded by a source requiring the release of raw data to that source; (3) that the requested Data is the minimum necessary to accomplish the purposes described herein; (4) that the Organization will meet the data privacy and security requirements described in this Application and supporting documents, and will ensure that any third party with access to the Data meets the data use, privacy and security requirements; and (5) to my authority to bind the Organization.

Signature: (Authorized Signatory for Organization)	
Printed Name:	Andrew Gerber
Title:	Andrew Gerber, MD, PhD, President and Medical Director of Silver Hill Hospital (SHH)
Date:	9/10/2024

Attachments:

A completed Application must have the following documents attached to the Application or uploaded separately to IRBNet:

- 1. IRB approval letter and protocol (if applicable), or research methodology (if protocol is not attached)
- 2. Data Management Plan (including one for each agent or contractor that will have access to or store the CHIA Data at a location other than the Organization’s location, off-site server and/or database);
- 3. CVs of Investigators (upload to IRBNet)

APPLICATIONS WILL NOT BE REVIEWED UNTIL THEY ARE COMPLETE, INCLUDING ALL ATTACHMENTS.