



Data Dissemination Policies and Procedures (D2P2)

SRC fully supports the use of information from its outcomes database to help advance surgical specialties. SRC developed the Data Dissemination Policies and Procedures (D2P2) to govern the use and sharing of database information with Center of Excellence (COE) and Surgeon of Excellence (SOE) participants, outside investigators and other third parties.

The D2P2 describes the process by which SRC program participants and others can submit a formal request for data to be used in publications, presentations and research initiatives. More specifically, it details the types of requests, acceptance criteria, request processes and fees related to outcomes data access and dissemination.

1) Use of Data that Does Not Require a Request

Individual Database Participant Information

Outcomes database participants may use their own program information for the following purposes without submitting a request for approval by SRC:

- Monitoring internal quality assurance and quality improvement processes to satisfy institutional requirements
- Reporting their own statistics and outcomes to inform individual referring physicians, help counsel patients and families, as well as strengthen collaborative decision-making with surgical and nonsurgical colleagues
- Aiding managed care, hospital-surgeon and other contract negotiations
- Promoting and marketing their program

Summary Data (Aggregate Reports)

Database participants may use the aggregate benchmark data contained in SRC's outcomes database summary reports for the following purpose without submitting a request for approval SRC:

- Monitoring internal quality assurance and quality improvement processes to satisfy institutional requirements
- Reporting how their own statistics and outcomes compare to aggregate benchmarks to inform individual referring physicians, help counsel patients and families as well as strengthen collaborative decision-making with surgical and nonsurgical colleagues

2) Use of Information that Requires a Data Access Request

Individual Database Participant Information

Database participants seeking additional data on their own programs that *is not* contained in the standard outcomes database program reports must submit a Data Access Request.

Research Data

Database participants and third parties seeking information for use in original research or analysis must submit a Data Access Request. Third parties include:

- Research institutions, individual researchers, clinicians and investigators affiliated or not affiliated with SRC's COE/SOE programs
- Businesses, payors, government agencies and other industry stakeholders

General Data

Industry stakeholders seeking general data for informational or commercial purposes must submit a Data Access Request. General data is not intended for use in original research or data analysis projects. Industry stakeholders include:

- Government agencies
- Pharmaceutical, medical device, and other medical or surgical industry-related companies, whether private or public
- Health insurance payors, both public and private
- Employer groups

3) Data Use that Does Not Require SRC Approval for Dissemination

Database participants may publish their own data as long as the publication or presentation contains no aggregate benchmark information derived from the outcomes database summary (aggregate) reports.

4) Data Use that Requires SRC Approval for Dissemination

National Summary Data

Database participants must first submit a Data Access Request to use the aggregate benchmark data contained in the database summary reports.

Research Data

Database participants and third parties that intend to publish or present outcomes database information in original research or analysis must submit a Data Access Request.

General Data

Industry stakeholders that intend to publish or present general outcomes database information must submit a Data Access Request.

Dissemination Uses

Summary information from database aggregate reports as well as research and general data generated through requests require SRC approval if it is to be used for:

- Presentations for professional, educational and society meetings, etc.
- Educational materials
- Grant proposals
- Abstracts and extended abstracts
- Research and manuscripts
- Oral and poster presentations
- Letters to the editor and reviews
- Methodology papers
- News releases, interviews and responses to media inquiries

5) Data Access Request Process

Request Submission

Parties seeking access to data for dissemination purposes must first submit a [Data Access Request](#) to SRC. The form for submission is located on SRC's website <http://www.surgicalreview.org/surgeons/data/> or provided by contacting srcsupport@surgicalreview.org.

SRC Review

SRC reviews the request form for completeness and contacts the requesting party to obtain any missing information or needed clarification.

Review and Assessment

SRC reviews the request and makes one of the following determinations:

- **Approved:** SRC determines the proposed publication, presentation, research project or study has merit and meets the criteria outlined below in section 6.
- **Conditional approval:** SRC decides to limit the data to be released or impose conditions on the information released. In publications and presentations, editorial or substantive changes or revisions are required.
- **Denial:** SRC determines the proposed publication, presentation, research project or study does not have merit or meet the criteria outlined below in section 6.

Cost Estimates

If the data request has been approved or conditionally approved, a fee may be charged.

SRC Notification to Requesting Party

SRC informs the requesting party, usually by email.

- **Approved or conditional approval:** SRC sends a Data Release Agreement (DRA) to the requesting party, which must be signed and returned to SRC before the data can be released. The DRA includes the following:
 - Description of the data to be provided
 - Estimated date of release of the data
 - Any fees charged for obtaining the data
 - Authorized and restricted uses of the data
 - Format of the data to be provided
- **Denial:** SRC provides an explanation of why the request was not approved.

Data Report Delivery

Upon receipt of the executed DRA and payment of any applicable fees, SRC compiles the requested data and forwards the report to the requesting party as specified in the DRA.

6) Considerations for Data Access Approval

SRC considers the following factors when evaluating a data request:

Individual COE Participant Data Requests

No database participant-specific data will be provided to any third party without the written consent of the participant.

Stakeholder requests for participant-specific data are considered by SRC on a case-by-case basis. The terms and conditions of any approved requests are documented in a formal written agreement between SRC and the requesting party, with appropriate authorization obtained from the database participant(s) involved.

Research Data Requests

- Scientific merit of the proposed research or study
- Ability of the proposed research or study to reasonably advance the current state of knowledge
- Anticipated SRC resources (e.g., staff time and effort) to retrieve the data

- Likely ability of the requesting party to complete the research or study given the requestor's experience, resources and other factors
- Relevance of the requested data to the proposed research or study
- Appropriateness of the requested data for release
- Potential impact of the proposed research or study on stakeholders
- Whether similar research projects or studies are underway or have been approved

General Data Requests

- Stated purpose for the request and intended use
- Anticipated SRC resources (e.g., staff time and effort) to retrieve the data
- Appropriateness of the requested data for release
- Potential impact of the proposed research or study on stakeholders

7) Data Dissemination: Post-Approval

Abstracts

If an abstract for presentation at a professional or society meeting is approved, the final presentation including handouts must be submitted to SRC at least 2 weeks prior to the presentation date. SRC coordinates the submission with the submitting party.

News Releases

News releases discussing the findings of SRC-approved research projects or publications must be approved by SRC and may not be released prior to formal publication. Authors are expected to abide by any applicable embargo limitations imposed by journals or other publishers.

Authorship

Authors will be acknowledged in accordance with the Uniform Requirements for Manuscripts Submitted to Biomedical Journals, available at www.icmje.org. Among other things, the ICMJE guidelines provide that authorship credit should be based on:

- Substantial contributions to conception and design, acquisition of data, or analysis and interpretation of data
- Drafting the article or revising it critically for important intellectual content, and
- Final approval of the version to be published.

Authors should meet all three conditions. SRC has the right to make authorship recommendations and resolve disputes as to authorship acknowledgement. SRC may also adopt additional authorship guidelines as it deems appropriate.