

Appendix 1: LIST OF DOCUMENTS NEEDED TO SUPPORT APPLICATION

The following is a recommended list of supporting documents to facilitate completion of the tool and to provide as part of your NEST Mark: Real-World Data Source Tool submission, as *applicable to your data source*.

Section 1: General Data Holder and Data Source Information

- Priority
 - Standard “data source description” (what it is; how it’s captured; known limitations)
 - Prior RWD use/credibility: list of notable publications and/or regulatory use cases (if any)
 - Documentation on how medical devices are identified in the data source

Section 2: Governance and Quality Management System

- Priority
 - Governance overview (including organizational chart, roles [including data stewardship roles] and responsibilities and escalation)
 - QMS/quality program overview (or QA program description) and Corrective and Preventive Action (CAPA) processes
 - SOP index or controlled document list
 - SOP on SOPs (*process for developing, approving, updating, and training on SOPs*)
 - Change control policy / Versioning SOP and change log
 - Incident/problem management policy with sample redacted incident ticket or postmortem template
 - Subprocessor inventory and functions (cloud/ETL/de-ID/linkage/analytics)
 - Training and competency program (beyond SOPs)
 - Regulatory compliance SOP (*audits and inspections*)
- Preferred
 - Internal audit process summary with example of an audit finding and resolution (redacted)
 - Sample external audit and/or inspection reports
 - Formal RACI for data curation and release sign-offs
 - Research Integrity and research methodologies SOP (as applicable)

Section 3: Data consistency & Stability and Quality Control Framework

Section 4: Data Accrual, Traceability, and System and Data Source Versioning

Section 5: ETL and Technical Controls

Section 6: Data Integration & Linkage

- Priority
 - Data accrual / capture SOP and documentation (including data entry guidelines, edit checks, coding guidelines, automatic data feeds, etc.)
 - Data provenance / traceability SOP and reports from original source to “research-ready” database
 - Data model/schema documentation + versioning approach
 - Data dictionary + coding/terminology mappings (ICD, CPT/HCPCS, LOINC, etc.)
 - ETL architecture overview (including diagrams)
 - ETL and integrity/completeness checks SOP (Extraction, loading, transformation. Include validation of transformations and methods to demonstrate completeness, with respect to the data dictionary)
 - Source-to-target mappings / lineage documentation
 - Data quality control (QC) and accuracy SOP (*edit checks, thresholds, verification, escalation steps used*)
 - Data quality assurance (QA) SOP (*Please provide with respect to the data dictionary*)
 - Sample QC/QA report(s) and evidence of issue closure (redacted)

- Logging/monitoring and audit log retention policy
- Audit trails SOP
- Data linkage SOP / process documentation (within the data source and/or with other data sources) and reports
- Software validation SOP (Software development life cycle (SDLC) and system validation)
- Preferred
 - Automated lineage tool output (if available)
 - Formal validation test scripts/checklists used for releases

Section 7: Data Access & Sharing, Privacy & Security, and Regulatory Transparency

- Priority
 - Data provenance and rights statement (who provides the data; authority to use/share)
 - Template DUA/BAA (redacted acceptable) and data use policy
 - Access request/approval workflow (how projects are approved; criteria)
 - Retention and destruction policy
 - De-identification methodologies and applicability SOP (Safe Harbor and/or Expert Determination summary)
 - Re-identification risk management approach (thresholds/mitigations)
 - Tokenization/pseudonymization approach (if used)
 - Disclosure control rules for outputs (e.g., min cell size/suppression policy)
 - System and data security program overview (SOP/policies/governance)
 - Independent assurance: SOC 2 Type II (preferred) or ISO 27001 (or equivalent) with scope statement
 - Access control SOP and policies (RBAC, provisioning/deprovisioning, privileged access)
 - MFA/SSO policy
 - Encryption standards and key management overview
 - Vulnerability management/patching policy
 - BCP/DR plan with RTO/RPO targets
 - IRB/ethics posture summary (if applicable)
- Preferred
 - Standard language for onward transfer and/or re-disclosure restrictions
 - Privacy impact assessment template or equivalent
 - Evidence of periodic re-assessment of de-identification risk
 - Penetration test executive summary + remediation tracking
 - Evidence of disaster recovery testing (annual test summary)

Section 8: Data Source Representativeness, Continuity of Care, and Longitudinality

Section 9: Quantitative Data Source Characteristics

- Priority
 - Coverage profile: sites/geography/settings/time span; refresh cadence/latency
 - Longitudinality/continuity metrics: follow-up distributions; encounter density
 - Missingness profiles for key fields (by site/time where feasible)
 - Representativeness assessment (benchmarks if available)
 - Linkage methodology + validation metrics (if linkage is offered)