Dear Colleagues:

The National Institutes of Health has released a new Data Management and Sharing Policy, effective Jan. 25, 2023, which requires submission of a Data Management and Sharing Plan as part of all proposals for research that will generate scientific data. The policy establishes NIH’s expectations for sharing scientific data. In parallel, other funders have implemented, or will soon implement, similar requirements. These policies apply to research that generates all different types of scientific data and are not limited to data derived from human participants.

Generally speaking, the NIH and other funders expect that the data generated during scientific research will be shared broadly at the conclusion of the research. The specifics of how best to share scientific data will depend in part on the type of data involved; in some situations, depositing data in a publicly accessible repository may constitute the best stewardship of the data. In other cases, data may need to be kept in a controlled environment with access limited to those who complete necessary prerequisites.

Researchers should plan now for the rollout of these requirements and develop Data Management and Sharing Plans that meet sponsor expectations. It will be important to consider and account for any required limitations on data sharing in your Data Management and Sharing Plans, including contractual, regulatory, and ethical limitations applicable to proprietary or human-derived data. Please note that many of the costs of data management and sharing may be included in budget proposals as allowable direct costs.

Further guidance about drafting Data Management and Sharing Plans is available on the JHU Research webpage. This JHU website contains information on funder expectations regarding Data Management and Sharing Plans, possible limitations on data sharing, and funder guidance regarding budgeting for data management and sharing. Additional resources, such as sample plans, are under development and will be available later this fall.

If you have specific questions about the NIH’s new policy or other funder requirements, you can contact the following people:

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Thank you for your attention.
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