



Data Sharing Guidance

As a recipient of NIH grant funds, Emory University is required to comply with all applicable provisions of the Final NIH Statement on Sharing Research Data, as set forth in [NIH Notice NOT-OD-03-032](#) and in the March 5, 2003 [NIH Data Sharing Policy and Implementation Guidance](#). This Guidance confirms Emory's compliance with this policy and directs investigators to the following resources to ensure its compliance.

Per this Notice, as of October 1, 2003:

- (a) All investigator-initiated grant applications to the NIH with direct costs in excess of \$500,000 in any single year should include a data sharing plan in the grant application or state why data sharing is not possible. This requirement applies to NIH-supported basic research, clinical studies, surveys, human subjects research, and non-human subjects research.
- (b) The data sharing plan should address the sharing of "Final Research Data" for research purposes. The term "Final Research Data" is defined in the [NIH Data Sharing Policy and Implementation Guidance](#) cited above.
- (c) For NIH Requests for Applications (RFA), Request for Proposals (RFP) and Program Announcements (PA), investigators should follow the instructions related to data sharing that are included in the RFA, RFP or PA. PAs, may request data sharing plans for applications that are less than \$500,000 in direct costs in a single year.
- (d) The sharing of Final Research Data that involves human subjects should be stripped of identifiers in accordance with the applicable requirements of the [Health Insurance Portability and Accountability Act \(HIPAA\)](#), the [Common Rule](#), [IRB directives and instructions](#), and the [NIH Data Sharing Policy and Implementation Guidance](#).

In addition to reviewing the [NIH Data Sharing Policy and Implementation Guidance](#), Investigators should consult the following NIH resources in developing and implementing data sharing plans:

- (a) [NIH Guide Notice dated 2/26/2003](#);
- (b) [NIH Guide Notice dated 3/1/2002](#);
- (c) [Frequently Asked Questions – Data Sharing](#);
- (d) [Data Sharing Workbook](#);
- (e) [NIH Data Sharing Brochure](#);
- (f) [Testimonials](#);
- (g) [Other Data Sharing Documents and Resources](#).

Links to all of these resources can be found at the following website:

http://grants2.nih.gov/grants/policy/data_sharing/

For questions regarding this policy contact the [Office of Sponsored Programs](#) or [The Compliance Office](#).