



Data Management and Resource Sharing

Rigor & Reproducibility Workshop

14 May 2024

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Director, Regulatory Operations

UTMB Institutional Office of Regulated Nonclinical Studies

Photo: Loen, Norway

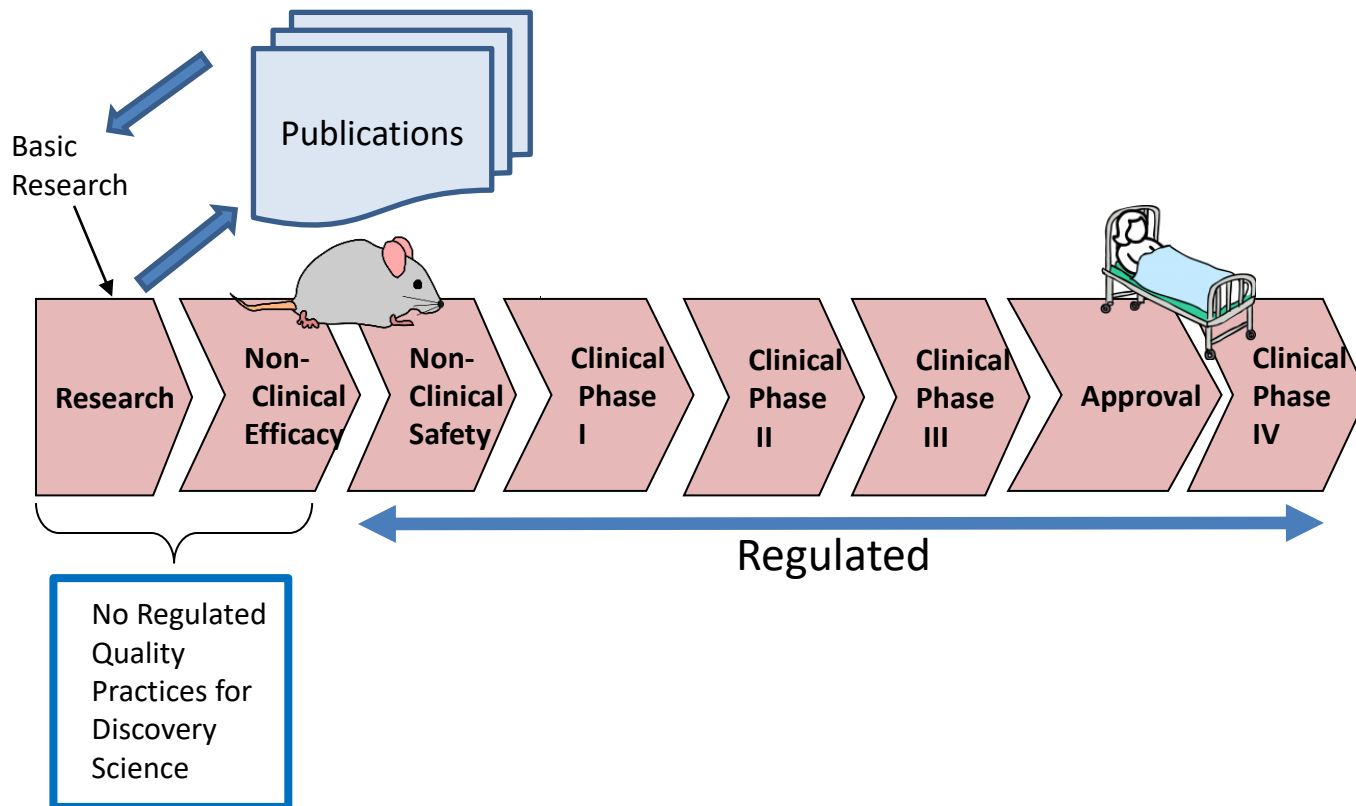
Topics

- Principles, Guidelines, Policies, Definitions
- Data Lifecycle
 - Data Quality & Integrity
- Case Study—Break out session



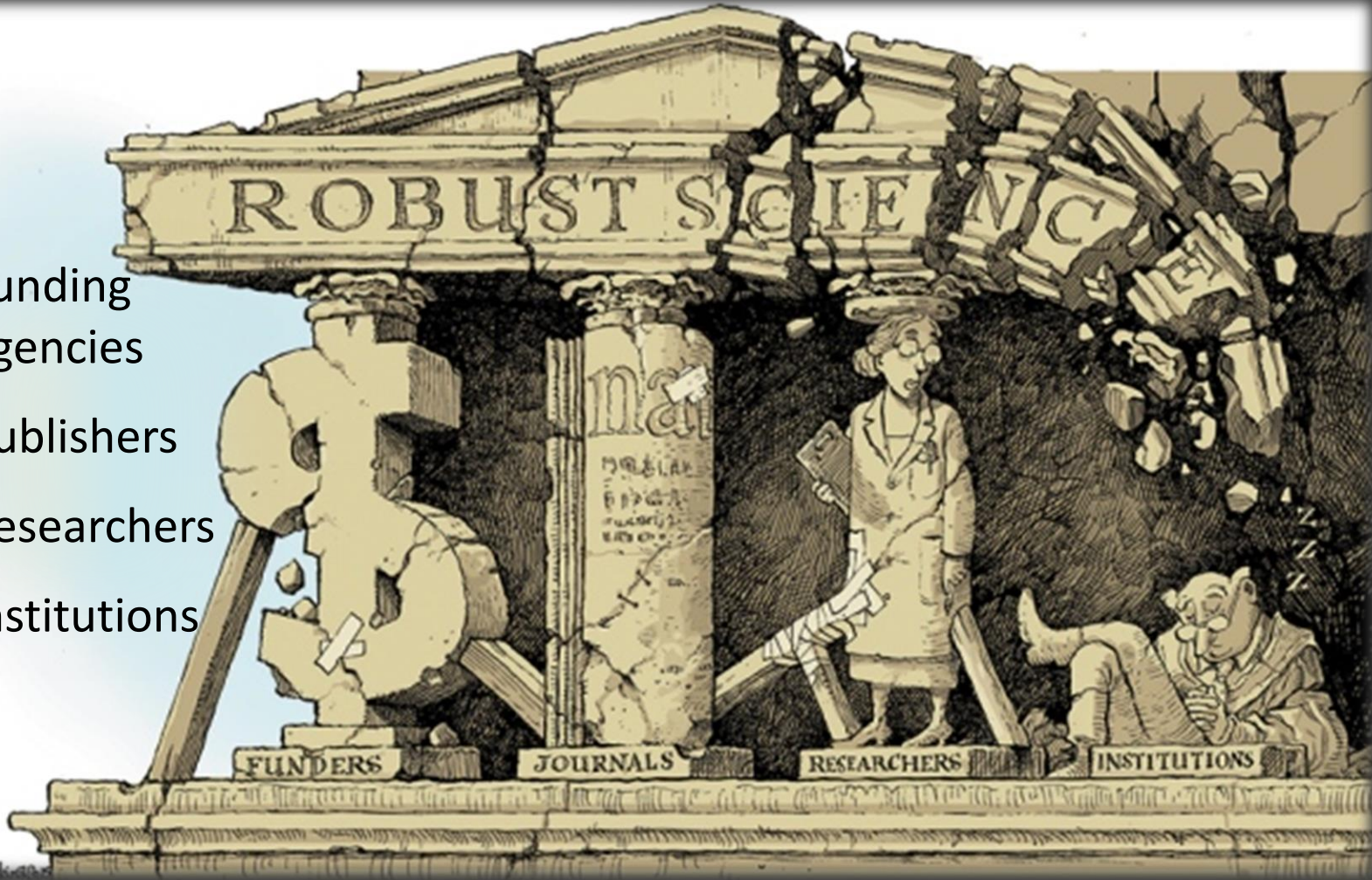
References provided on slides

Product Development Pathway



Stakeholders of Robust Science

- Funding agencies
- Publishers
- Researchers
- Institutions



<https://www.nature.com/news/robust-research-institutions-must-do-their-part-for-reproducibility-1.18259>

Scientific Advancement

- Funding agencies
- Publishers
- Researchers
- Institutions

“Two of the cornerstones of science advancement are rigor in designing and performing scientific research and the ability to reproduce biomedical research findings.”

~ NIH Central Resource for Grants and Funding Information

NIH Public Workshop (2014)

- Funding agencies
- Publishers
- Researchers
- Institutions

- **Sponsors:** NIH + *Nature Publishing Group* + *Science*
- **Issue:** Reproducibility, Rigor of research findings
- **Attendees:** Journal editors (>30 basic/preclinical science journals where NIH-funded investigators publish)
- **Goals:** Identify common opportunities in the scientific publishing arena to *enhance rigor and further support research that is reproducible, robust, and transparent*
- **Outcome:** set of principles to facilitate these goals, which a considerable number of journals have agreed to endorse



NIH Principles and Guidelines

- Funding agencies
- Publishers
- Researchers
- Institutions

Principles and Guidelines for Reporting Preclinical Research:

- Rigorous statistical analysis
- Transparency in reporting
- Data and material sharing
- Consider establishing best practice guidelines for:
 - Antibodies
 - Cell lines
 - Animals
- Endorsements (journals, associations, societies)
- Adapted Guidelines (to fit unique need)

Data and Material Sharing

- Funding agencies
- Publishers
- Researchers
- Institutions

- Require datasets be made available (where ethically appropriate) upon request
 - during manuscript review
 - upon publication
- Recommend datasets in public repositories, where available
- Encourage presentation of all other data values in machine readable format in the paper (or supplementary information)
- Encourage sharing of software

Data and Material Sharing

- Funding agencies
- Publishers
- Researchers
- Institutions

NOT-OD-21-013 Final NIH Policy for Data Management and Sharing (DMS)

Release Date: 29 October 2020

Effective Date: 25 January 2023

Section I, Purpose:

“The National Institutes of Health (NIH) Policy for Data Management and Sharing...reinforces NIH's longstanding commitment to making the results and outputs of NIH-funded research available to the public through effective and efficient data management and data sharing practices. Data sharing enables researchers to rigorously test the validity of research findings, strengthen analyses through combined datasets, reuse hard-to-generate data, and explore new frontiers of discovery. In addition, NIH emphasizes the importance of good data management practices, which provide the foundation for effective data sharing and improve the reproducibility and reliability of research findings. NIH encourages data management and data sharing practices consistent with the FAIR data principles.”

[NOT-OD-21-013: Final NIH Policy for Data Management and Sharing](#)

Data and Material Sharing

- Funding agencies
- Publishers
- Researchers
- Institutions

NIH encourages data management and data sharing practices consistent with the FAIR data principles.

F

Findable

A

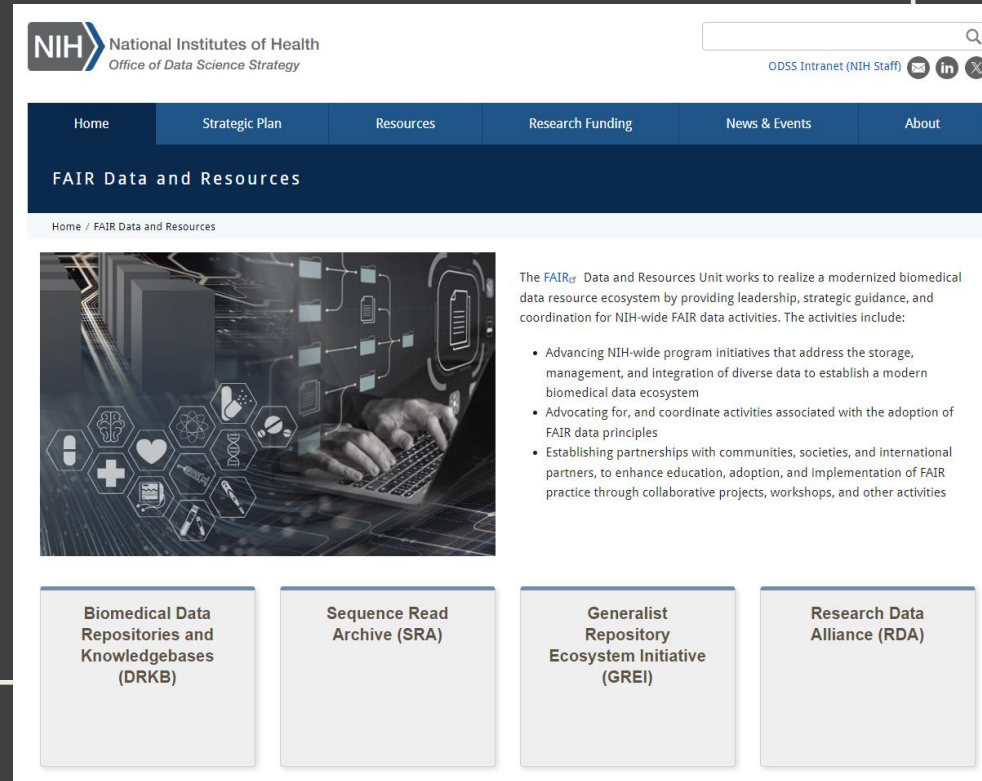
Accessible

I

Interoperable

R

Re-usable



NIH National Institutes of Health
Office of Data Science Strategy

ODSS Intranet (NIH Staff)

Home Strategic Plan Resources Research Funding News & Events About

FAIR Data and Resources

Home / FAIR Data and Resources

The FAIR_{er} Data and Resources Unit works to realize a modernized biomedical data resource ecosystem by providing leadership, strategic guidance, and coordination for NIH-wide FAIR data activities. The activities include:

- Advancing NIH-wide program initiatives that address the storage, management, and integration of diverse data to establish a modern biomedical data ecosystem
- Advocating for, and coordinate activities associated with the adoption of FAIR data principles
- Establishing partnerships with communities, societies, and international partners, to enhance education, adoption, and implementation of FAIR practice through collaborative projects, workshops, and other activities

Biomedical Data Repositories and Knowledgebases (DRKB)

Sequence Read Archive (SRA)

Generalist Repository Ecosystem Initiative (GREI)

Research Data Alliance (RDA)

[FAIR Data and Resources | Data Science at NIH](#)

Data and Material Sharing

- Funding agencies
- Publishers
- Researchers
- Institutions

NIH encourages data management and data sharing practices consistent with the FAIR data principles.

F Findable

A Accessible

I Interoperable

R Re-usable



Data Sharing Plan - Elements

1. Data Type
2. Related Tools, Software and/or Code
3. Standards
4. Data Preservation, Access, and Associated Timelines
5. Access, Distribution, or Reuse Considerations
6. Oversight of Data Management and Sharing

<https://sharing.nih.gov/data-management-and-sharing-policy/planning-and-budgeting-for-data-management-and-sharing/writing-a-data-management-and-sharing-plan#sample-plans>

NIH Data Sharing Templates / Resources

| Sample Plan Description | NIH Institute or Center | Tags Filter |
|---|-------------------------|--|
| Clinical and/or MRI data from human research participants | NIMH | human_subjects controlled_access imaging video multimedia clinical_research phenotypic |
| Genomic data from human research participants | NIMH | genomics human_subjects controlled_access phenotypic |
| Genomic data from a non-human source | NIMH | genomics animal_models |
| Secondary data analysis | NIMH | human_subjects controlled_access secondary_data_analysis |
| Human genomic data | NHGRI | controlled_access genomics |
| Technology development | NHGRI | technology genomics |
| Human clinical and genomics data | NICHD | clinical_research genomics controlled_access |
| Gene expression analysis data from non-human model organism (zebrafish) | NICHD | rna animal_models |
| Human survey data | NICHD | human_subjects controlled_access qualitative_research surveys_and_interviews |
| Clinical Data from Human Research Participants | NIDDK | clinical_research human_subjects controlled_access |
| Basic Research from a Non-Human Source Example | NIDDK | imaging rna animal_models |
| Secondary Data Analysis Example | NIDDK | secondary_data_analysis controlled_access software |
| Survey and Interview Example | NHGRI | human_subjects surveys_and_interviews controlled_access |

NOT-OD-21-013

Key Dates

Release Date: October 29, 2020
Effective Date: January 25, 2023

Related Announcements

- [NOT-OD-23-053](#) - Reminder: NIH Policy for Data Management and Sharing effective 10/29/2023
- [NOT-OD-23-012](#) - Reminder: FORMS-H Grant Application Forms & Instructions Now Available
- [NOT-CA-23-007](#) - Request for Information (RFI): Soliciting Input on the Use and Management of Data
- [NOT-OD-22-214](#) - Supplemental Information to the NIH Policy for Data Management and Sharing
- [NOT-OD-22-213](#) - Supplemental Information to the NIH Policy for Data Management and Sharing
- [NOT-OD-22-189](#) - Implementation Details for the NIH Data Management and Sharing Policy
- [NOT-OD-22-104](#) - Notice of Extension of the Public Comment Period for NOT-OD-22-104 - Responsible Management and Sharing of American Indian/ Alaska Native Participant Data
- [NOT-OD-22-064](#) - Request for Public Comments on DRAFT Supplemental Information to the NIH Policy for Data Management and Sharing: American Indian/ Alaska Native Participant Data
- [NOT-OD-22-029](#) - Request for Information on Proposed Updates and Long-Term Management of Research Participant Data
- [NOT-HG-21-023](#) - Notice Announcing NHGRI Guidance for Third-Party Involvement in Research Participant Data
- [NOT-HG-21-022](#) - Notice Announcing the National Human Genome Research Institute's Policy for Data Management and Sharing
- [NOT-OD-21-014](#) - Supplemental Information to the NIH Policy for Data Management and Sharing
- [NOT-OD-21-015](#) - Supplemental Information to the NIH Policy for Data Management and Sharing
- [NOT-OD-21-016](#) - Supplemental Information to the NIH Policy for Data Management and Sharing
- [NOT-OD-20-013](#) - Request for Public Comments on a DRAFT NIH Policy for Data Management and Sharing
- [NOT-MH-21-265](#) - Notice of Biospecimen Sharing Policy for the National Institutes of Health
- [NOT-OD-22-131](#) - Request for Public Comments on DRAFT Supplemental Information to the NIH Policy for Data Management and Sharing: Research Participant Data
- [NOT-OD-22-195](#) - New NIH "FORMS-H" Grant Application Forms and Instructions
- [NOT-OD-22-198](#) - Implementation Changes for Genomic Data Sharing Plans

Issued by

Office of The Director, National Institutes of Health (OD)

Consortium Written Agreements



2024

“For foreign subrecipients, a provision requiring the foreign subrecipient to provide access to copies of all lab notebooks, all data, and all documentation that supports the research outcomes as described in the progress report, to the primary recipient with a frequency of no less than once per year, in alignment with the timing requirements for Research Performance Progress Report submission. Such access may be entirely electronic.”

Policy: NOT-OD-23-182 <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-23-182.html> effective January 1, 2024

Video Resource: <https://www.youtube.com/watch?v=mfHIV53-M3A>

Webinar On-Demand Video (Broadcast Oct. 17, 2023):
<https://grants.nih.gov/learning-center/nih-subaward-requirements>

Why is Data Management and Resource Sharing Important?

You Tube

Search



“Everything you need to know is in the article.”

Dr. Judy Benign, an oncologist, requests data from a scientist who recently published his research findings in *Science*.



Data Sharing and Management Snafu in 3 Short Acts

NYU
HEALTH
SCIENCES
LIBRARY

NYU Health Sciences Library

Subscribe 115

57,630 views

<https://www.youtube.com/watch?v=N2zK3sAtr-4>

Resource Sharing—NIH

- Funding agencies
- Publishers
- Researchers
- Institutions

NIH considers the sharing of unique research resources developed through NIH-sponsored research an important means to enhance the value and further the advancement of research.

When resources have been developed with NIH funds and the associated research findings published or provided to NIH, it is important that the results be made readily available for research purposes to qualified individuals within the scientific community.



https://grants.nih.gov/grants/peer/guidelines_general/Resource_sharing_plans.pdf

Resource Sharing—NIH

- Funding agencies
- Publishers
- Researchers
- Institutions

- Samples
- Reagents
- Model organism (e.g., transgenic mouse strain)
- Scientific Data

Scientific Data – Policy Definition

The recorded factual material commonly accepted in the scientific community as of **sufficient quality to validate and replicate research findings**, regardless of whether the data are used to support scholarly publications.

Scientific Data (NIH *DMS policy* definition) *do not* include laboratory notebooks, preliminary analysis, completed case report forms, drafts of scientific papers, plans for future research, peer reviews, communication with colleagues, or physical objects, such as laboratory specimens.



Note! Contracts and/or other applicable regulations may require retention of additional documents!

Metadata – Policy Definition

Data that provide additional information intended to make scientific data interpretable and reusable (e.g., date, independent sample and variable construction and description, methodology, data provenance, data transformations, any intermediate or descriptive observational variables).

Policy Definitions

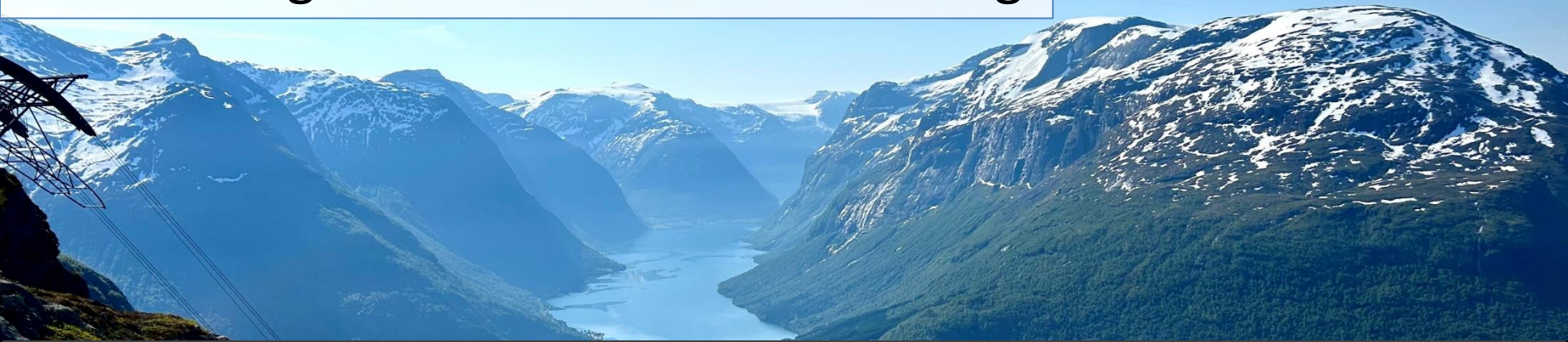
Data Management = The process of validating, organizing, protecting, maintaining, and processing scientific data to ensure the accessibility, reliability, and quality of the scientific data for its users.

Data Sharing = The act of making scientific data available for use by others (e.g., the larger research community, institutions, the broader public), for example via an established repository

Data Management and Sharing Plan (Plan) = A plan describing the data management, preservation, and sharing of scientific data and accompanying metadata.

Where Do We Begin?





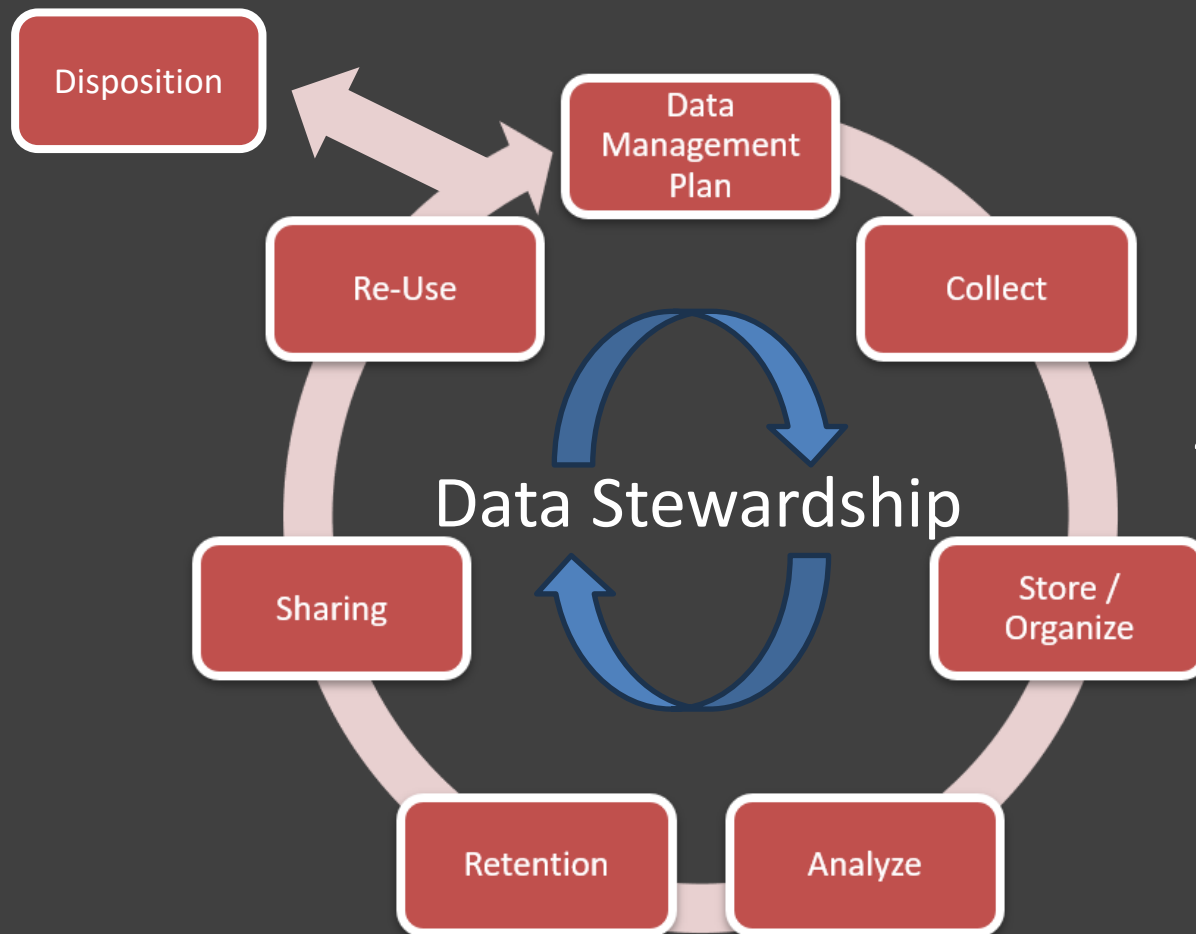
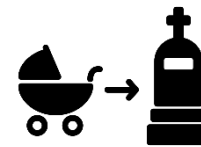
Topics

- Principles, Guidelines, Policies, Definitions
- **Data Lifecycle**
 - **Data Quality & Integrity**
- Case Study—Break out session



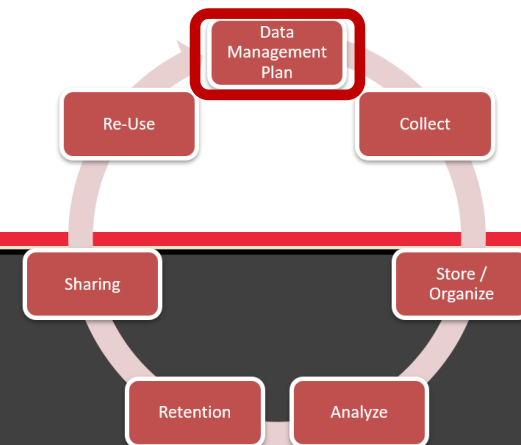
References provided on slides

Data Lifecycle



1. Data Type
2. Related Tools, Software and/or Code
3. Standards
4. Data Preservation, Access, and Associated Timelines
5. Access, Distribution, or Reuse Considerations
6. Oversight of Data Management and Sharing

Data Management



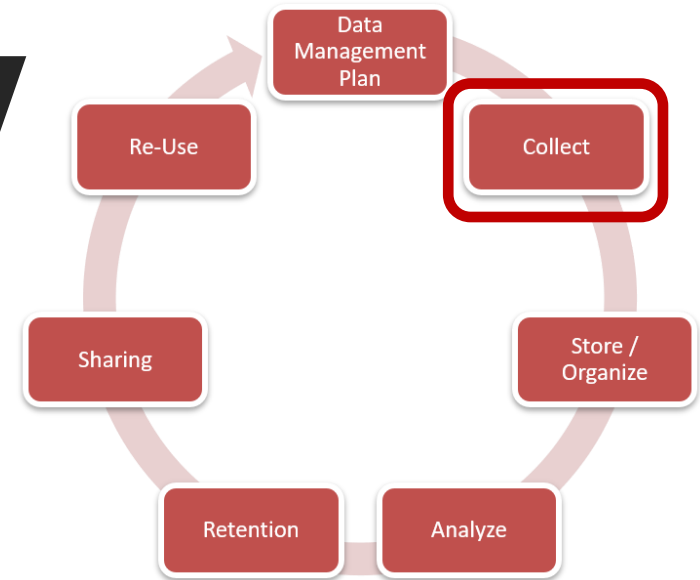
- Data is (are) a scholarly product
- Data are fragile and easily lost
- Growing research data requirements
- Good management helps prevent errors and increases the quality of your analysis
- Well-managed and accessible data allows others to validate and replicate findings
- **Research data management** facilitates sharing of research data and, when shared, data can lead to valuable discoveries by others outside of the original research team

University of Pittsburgh Library System

Data Collection

Perform an inventory...

- Source (Raw) Data
- Types (observational, derived, etc.)
- Format (text, numeric, modeling, images, etc.)
- Quantity
- Standards (e.g., HIPAA)
- Proprietary
- Owner



Source Data (Original)

First capture of information



ALCOA Principles

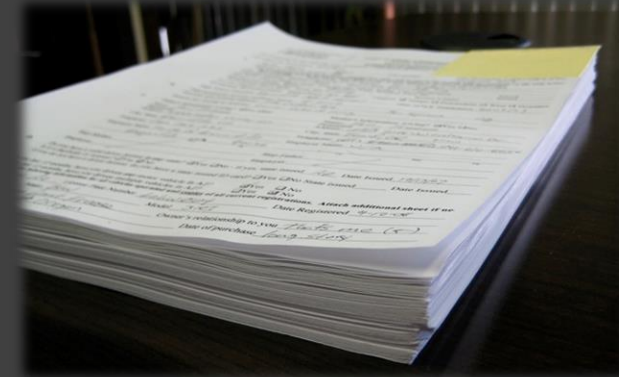
Applies to paper and/or electronic data

Data Quality

- Atributable
- Legible
- Contemporaneous
- Original
- Accurate

Data Integrity

- Complete, Consistent, Enduring, Readily Available



Data and Data Integrity

“**Data** are the foundation on which scientific, engineering, and medical knowledge is built.”

~Ensuring the Integrity, Accessibility, and Stewardship of Research Data in the Digital Age, National Academy of Science, National Academy of Engineering, and Institute of Medicine; Preface, 2009

“**Data integrity** is the degree to which data are complete, consistent, accurate, trustworthy and reliable and these characteristics of the data are maintained throughout the data life cycle...”

~OECD Advisory Document on GLP Data Integrity; 20 Sept. 2021

Data Risk - Non-enduring



Scenario 1 (Worst case):

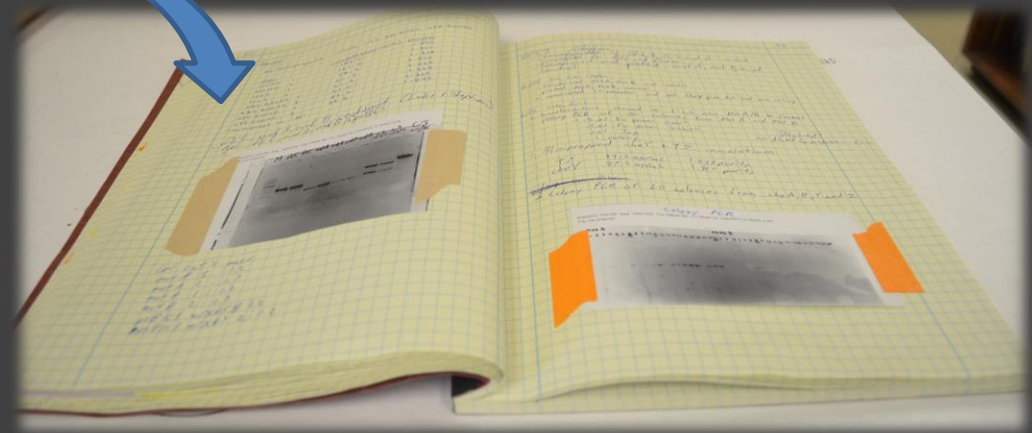
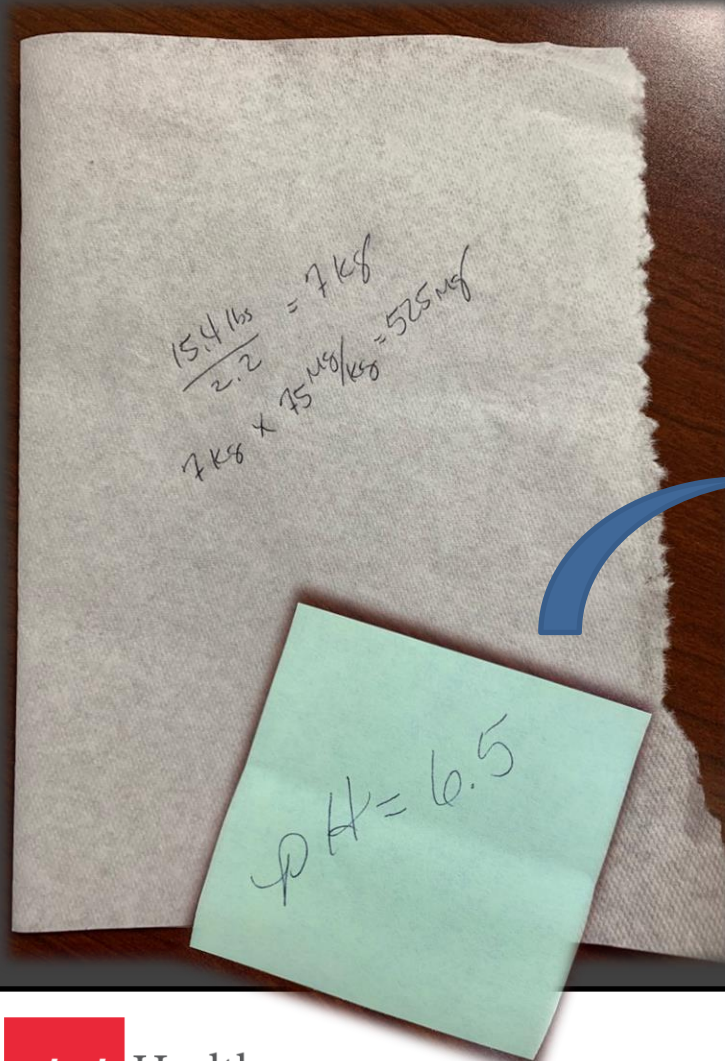


Scenario 2: Transcribe



Scenario 3 (Lower Risk): Affix

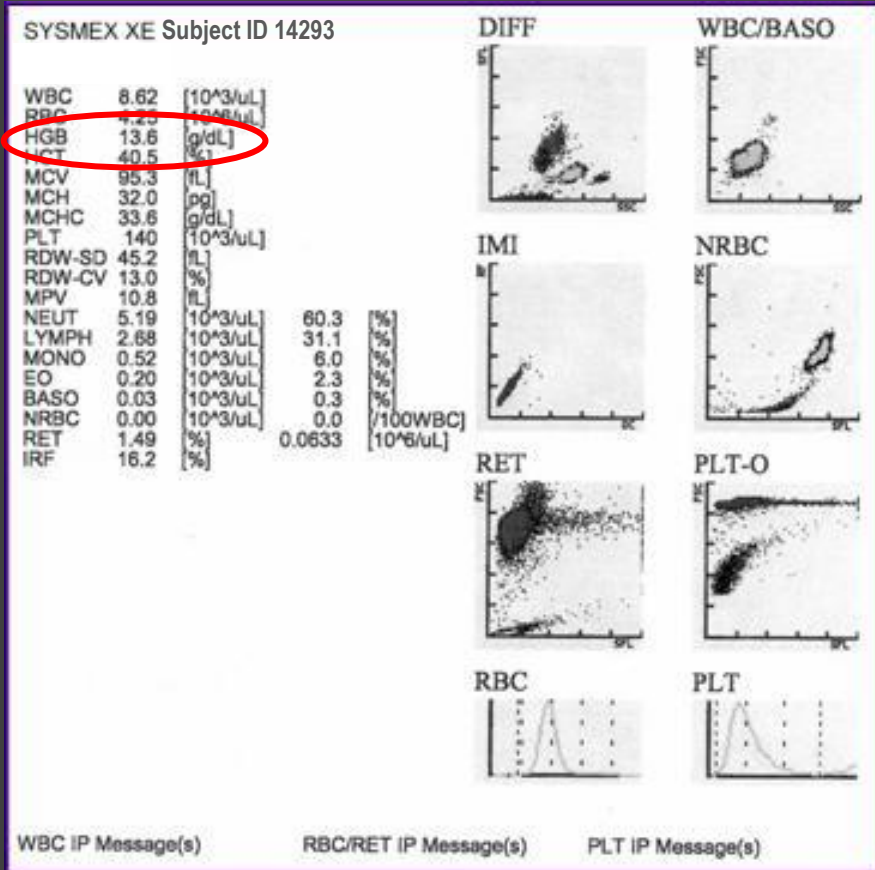
Scenario 4: Eliminate bad practice



Data Risk - Transcription Errors



Hemoglobin Value



| Animal | HGB |
|--------|------|
| 12938 | 12.2 |
| 14039 | 8.9 |
| 14293 | 3.6 |
| 14980 | 13.8 |
| 15209 | 12.5 |
| 15490 | 9.5 |
| 15560 | 14.0 |

Source: Google Images

Data Risk - Illegible Data Entries



May 29, 2011

5/3/2024

Data Quality/Reproducibility Exercise

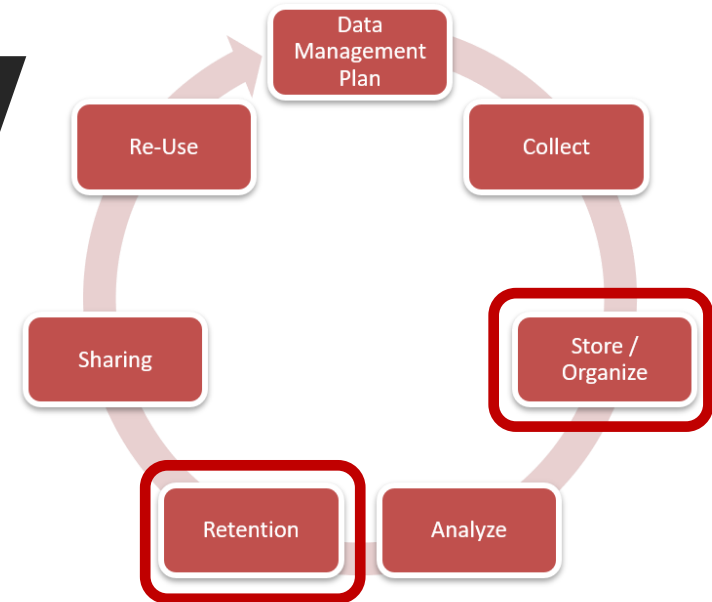
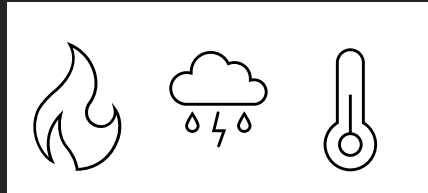


Organization and Storage / Retention

Things to think about prospectively...

Conditions

- Location (physical / electronic)
- Transcription of source data
- Accessibility (limited)
- Security
- Change control
- Protection
- Migration




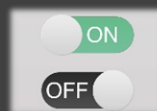
Contents

- Retain data and *methods* to allow for study reconstruction
- Critical communication?



Managing Electronic Data

- Audit Trails / Meta Data
- Security / Encryption
- Software Compatibility
- Back-up
- Program Updates
 - Automatic
 - Impact to significant digits
- Data Migration
- Windows PC vs. MAC 
- Checksums

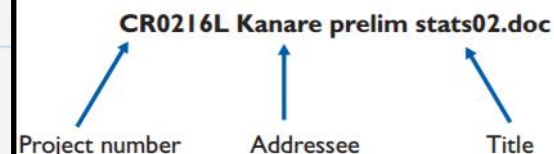
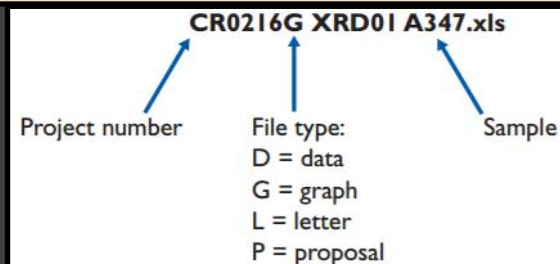


Documents library

Example.Study2018.031.0002

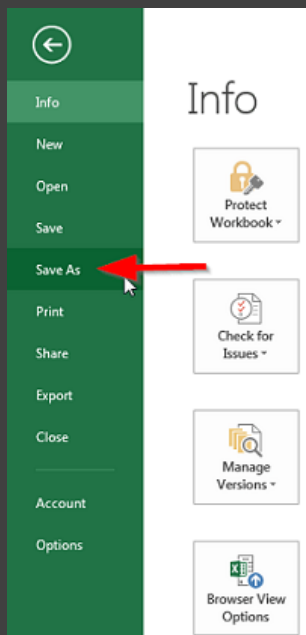
Name

1. Study Plan
2. Compliance Approvals
3. Project Management
4. Study Form Templates
5. Communication
6. Source Data
7. Data Tables
8. Statistics
9. Contributing Reports
10. Summary Report

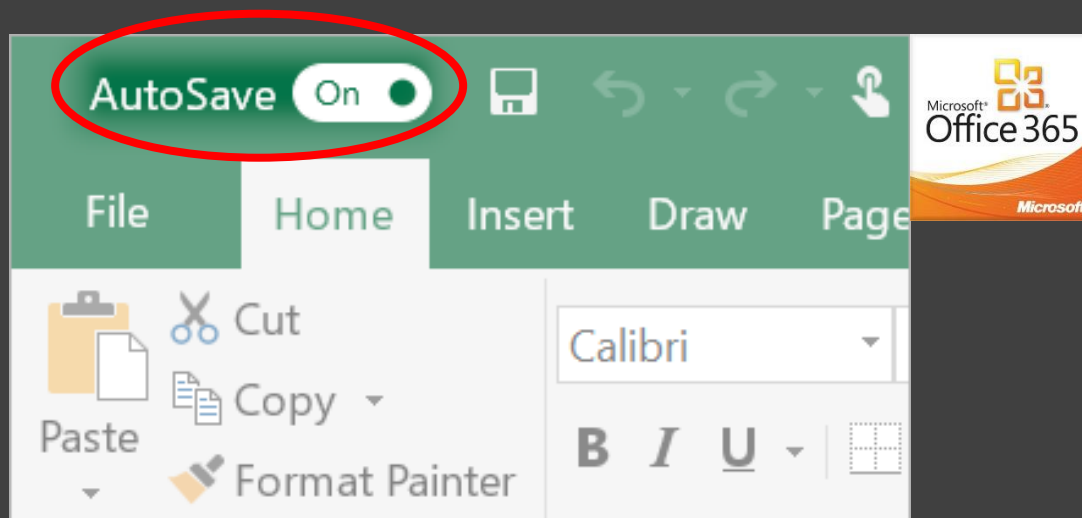


Risks to Electronic Data

Overwriting of information



- Save
- Save As
- AutoSave



Electronic Laboratory Notebooks

Pros

- Project organization
- Collaboration
- Custom forms/fields to assure all data are captured
- Procedure Checklists
- Time standardization
- Auto reminders
- Searchable
- Audit trail
- Data exportable



Cons

- Cost
- Sustainability (\$)
- System administration
- Compatibility with other systems
- Software updates/data migration verification
- Discontinued (or support discontinued)

Data Analysis (Data Manipulation)

Prospective thinking...

- Implement methods to reduce transcription errors
- Define inclusion / exclusion criteria
- Develop prospective statistical plan (study plan)
- Retain *methods (protocols)* that allow for study reconstruction

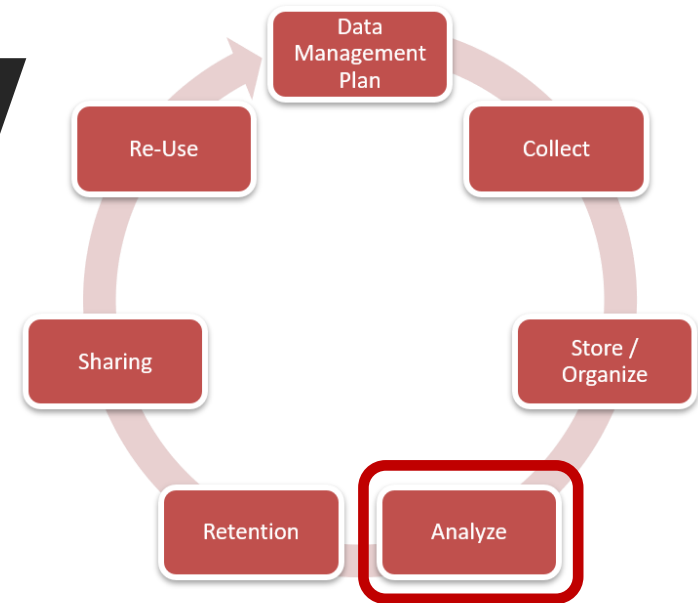
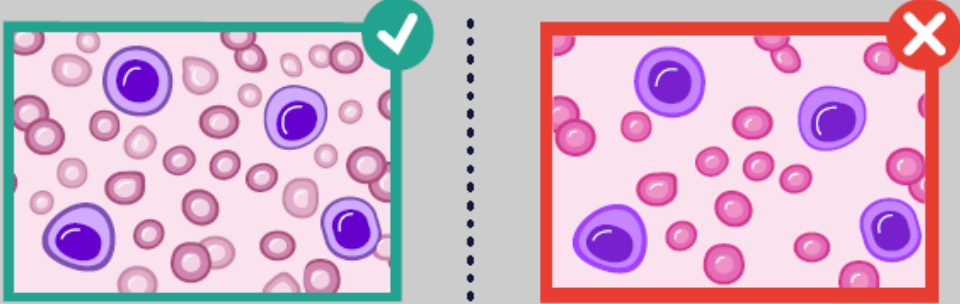


Image Manipulation

- Document all changes
- Retain unprocessed image
- Follow journal guidelines for permissible processing

COLOR ENHANCEMENTS
Changing the contrast, color, or brightness



Ensure that the meaning of the image stays the same and fine details are not removed.

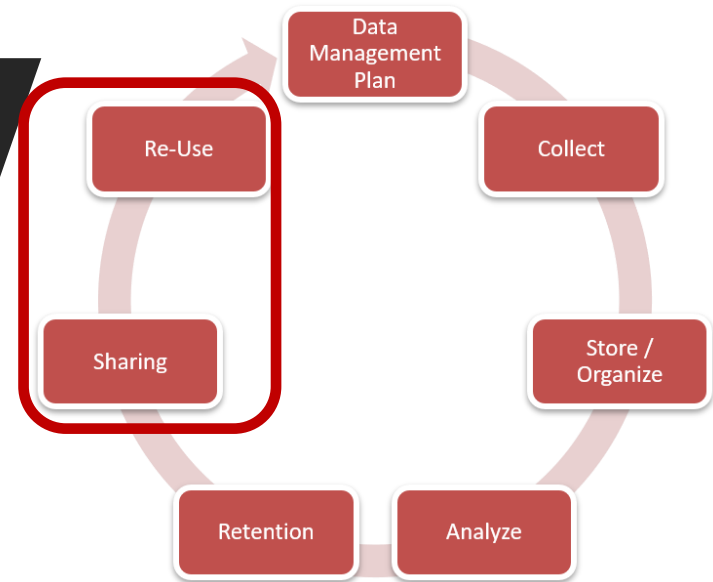
Contrast and saturation were increased causing the background cells to disappear.

https://ori.hhs.gov/sites/default/files/2017-12/6_Image_Manipulation_scalable.pdf

Mechanisms / Conditions for Sharing

Define conditions...

- Mechanisms & Format
 - SharePoint / OneDrive
 - Online repositories
 - Coding
 - Mixed media
- Restrictions (e.g., HIPAA), Conditions / Exclusions
- Sharing agreements / plans
Schedule/timeline
["no later than the time of publication or the end of the award or support period, whichever comes first."]
- Acknowledgements of source data
- Instructions



NIH ImmPort Data Upload Templates

Table Of Contents

1. adverseEvents.txt
2. assessments.txt
3. basic_study_design.txt
4. bioSamples.txt
5. controlSamples.txt
6. CyTOF_Derived_data.txt
7. ELISA_Results.txt
8. ELISPOT_Results.txt
9. experiments.txt
10. experimentSamples.CYTOF.txt
11. experimentSamples.ELISA.txt
12. experimentSamples.ELISPOT.txt
13. experimentSamples.Flow_Cytometry.txt
14. experimentSamples.Gene_Expression_Array.txt
15. experimentSamples.Genotyping_Array.txt
16. experimentSamples.HAI.txt
17. experimentSamples.HLA.txt
18. experimentSamples.Image_Histology.txt
19. experimentSamples.KIR.txt
20. experimentSamples.Mass_Spectrometry_Metabolomics.txt
21. experimentSamples.Mass_Spectrometry_Proteomics.txt
22. experimentSamples.MBAA.txt
23. experimentSamples.Neutralizing_Antibody_Titer.txt
24. experimentSamples.Other.txt
25. experimentSamples.QRT-PCR.txt
26. experimentSamples.RNA_Sequencing.txt
27. experimentSamples.Virus_Neutralization.txt
28. FCM_Derived_data.txt
29. HAI_Results.txt
30. HLA_Typing.txt
31. immuneExposure.txt
32. interventions.txt
33. KIR_Typing.txt
34. labTest_Results.txt
35. labTestPanels.txt
36. labTests.txt
37. Mass_Spectrometry_Metabolomic_Results.txt
38. Mass_Spectrometry_Proteomic_Results.txt
39. MBAA_Results.txt
40. PCR_Results.txt
41. protocols.txt
42. publicRepositories.txt
43. Reagent_Sets.txt
44. reagents.Array.txt
45. reagents.CyTOF.txt
46. reagents.ELISA.txt

47. reagents.ELISPOT.txt
48. reagents.Flow_Cytometry.txt
49. reagents.HAI.txt
50. reagents.HLA_Typing.txt
51. reagents.KIR_Typing.txt
52. reagents.MBAA.txt
53. reagents.Neutralizing_Antibody_Titer.txt
54. reagents.Other.txt
55. reagents.PCR.txt
56. reagents.Sequencing.txt
57. reagents.Virus_Neutralization.txt
58. RNA_SEQ_Results.txt
59. standardCurves.txt
60. study_design_edit.txt
61. subjectAnimals.txt
62. subjectHumans.txt
63. treatments.txt
64. Virus_Neutralization_Results.txt



- Study Design
- Protocols (procedures)
- Public Repositories
- BioSamples
- Control Samples
- Experiment samples
- Lab Tests
- PCR Results
- Reagent sets
- Reagent Sequencing
- Standard Curves
- Treatments



IMMPORT
Private Data

Your site for managing ImmPort
data uploads

<https://import.niaid.nih.gov/home>

DMS Costs



Planning & Budgeting for Data Management and Sharing

Prospectively planning for how scientific data will be managed and ultimately shared is a crucial first step in optimizing the reach of data generated from NIH-funded research.

- **Determine** if proposed research is subject to the DMS policy.
- **Identify** appropriate methods/approaches and repositories for managing and sharing scientific data.
- **Develop a Plan** for managing and sharing scientific data and include in application or proposal. If subject to Genomic Data Sharing Policy, submit a single Plan that addresses genomic data considerations.
- **Estimate and request funds** for data management and sharing activities (if not already covered by institution or other sources.)

The [NIH Data Management & Sharing \(DMS\) Policy](#), effective January 25, 2023, applies to all research, funded or conducted in whole or in part by NIH, that results in the generation of **scientific data**

[DMS_flyer.pdf \(nih.gov\)](#)

Reference

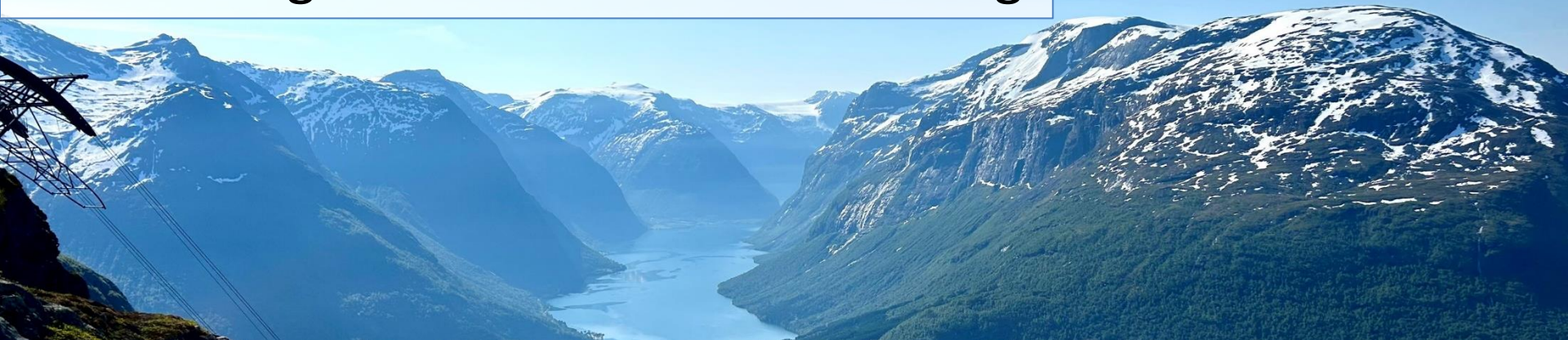


■ 12 Days of Data Management and Sharing Tips & Resources

As we get closer to the January 25, 2023 effective date of the new NIH Data Management and Sharing (DMS) Policy, here are 12 tips and resources we would like to gift you – but you might have to supply your own partridge in a pear tree

- [1-page flyer](#) on the who, what, where, and when of the DMS Policy
- [2-part webinar series](#) on understanding the DMS Policy and digging deeper into what's required
- [3 key steps](#) to implement the DMS Policy
- [4+ sample DMS Plans](#) to assist as you develop a plan for your research, and an [optional format page](#)
- [5 minutes](#) is all it takes to determine what sharing policies apply to your research with this [decision tool](#)
- [6 elements](#) recommended for a robust DMS Plan, a key component for your funding application
- [7 examples of allowable costs](#) for data management and sharing
- [8+ slides](#) in our [Implementing the DMS Policy slide deck](#)
- [Fewer than 9 key differences](#) between the 2003 data sharing policy vs. the new DMS policy, illustrated on the [policy comparison table](#)
- [10 activities](#) that generally do and do not generate scientific data, including a [complete list of activity codes](#) generally subject to the DMS Policy
- [11+ FAQs](#) to address your questions, and [who to contact](#) for more information
- [Dozens of NIH-supported data repositories](#) and resources to help you [find](#) an appropriate repository for your research

May your days be merry and bright, and may all your submissions go right



Closing Thoughts...

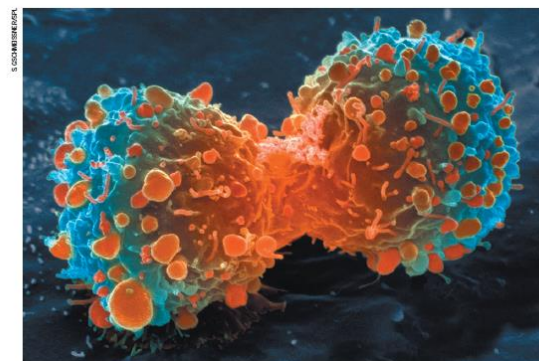
- 53 landmark studies
- 6 confirmed (11%)
 - Controls
 - Reagents
 - Investigator bias
 - Described complete data set

ANAR INFLUENZA Shift expertise to track mutations where they emerge [p.524](#)

EARTH SYSTEMS Past climates give valuable clues to future warming [p.517](#)

INSTITUTE OF SCIENCE Descartes' lost letter tracked using Google [p.540](#)

OUTLOOK Wylie Vale and an elusive stress hormone [p.542](#)



Many landmark findings in preclinical oncology research are not reproducible, in part because of inadequate cell lines and animal models.

Raise standards for preclinical cancer research

C. Glenn Begley and Lee M. Ellis propose how methods, publications and incentives must change if patients are to benefit.

Efforts over the past decade to characterize the genetic alterations in human cancers have led to a better understanding of molecular drivers of this complex set of diseases. Although we in the cancer field hoped that this would lead to more effective drugs, historically, our ability to translate cancer research to clinical success has been remarkably low¹. Sadly, clinical

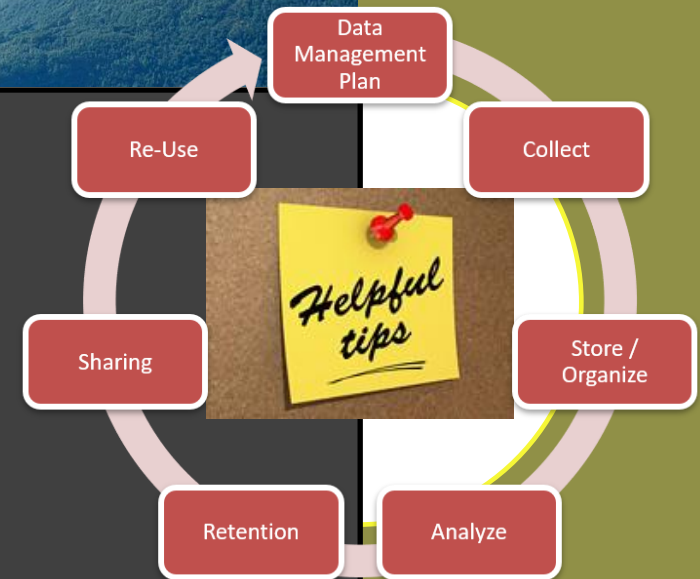
trials in oncology have the highest failure rate compared with other therapeutic areas. Given the high unmet need in oncology, it is understandable that barriers to clinical development may be lower than for other disease areas, and a larger number of drugs with suboptimal preclinical validation will enter oncology trials. However, this low success rate is not sustainable or acceptable, and

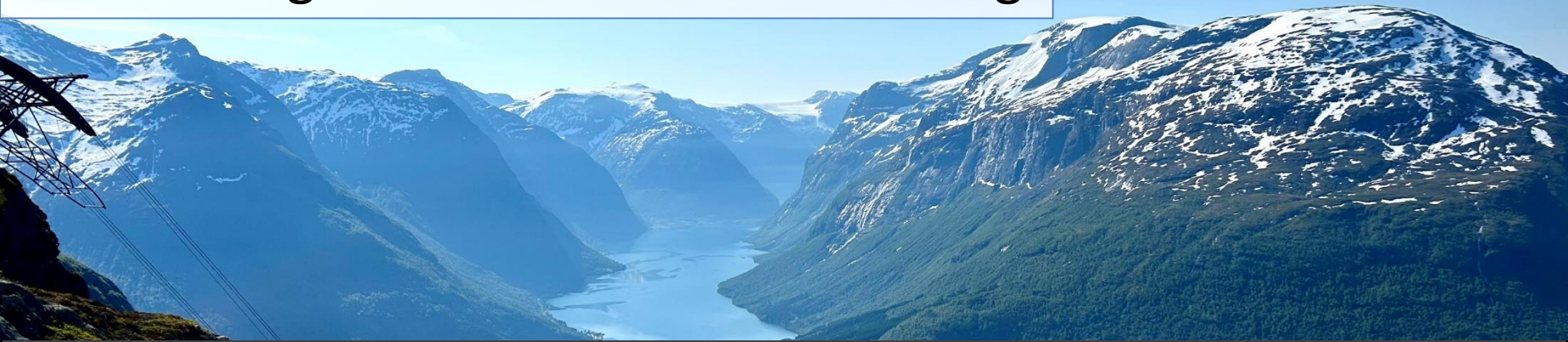
investigators must reassess their approach to translating discovery research into greater clinical success and impact.

Many factors are responsible for the high failure rate, notwithstanding the inherently difficult nature of this disease. Certainly, the limitations of preclinical tools such as inadequate cancer-cell-line and mouse models² make it difficult for even ▶

Data Management and Resource Sharing

- Be organized!
- Advocate data stewardship throughout the data lifecycle
- Implement the ALCOA principles
- Verify requirements in RFP / Contract
- Understand that a Data Management and Sharing Plan is a Term and Condition of the Notice of Award (NIH)





Topics

- Principles, Guidelines, Policies, Definitions
- Data Lifecycle
 - Data Quality & Integrity
- **Case Study—Break out session**



References provided on slides

Case Study—Data Sharing

Identify options (i.e., conditions) for sharing data from a study with 500 human subjects being screened for sexually transmitted diseases.

Case Study—Data Sharing

The proposed research will include data from approximately 500 subjects being screened for three bacterial sexually transmitted diseases (STDs) at an inner-city STD clinic. The final dataset will include self-reported demographic and behavioral data from interviews with the subjects and laboratory data from urine specimens provided. Because the STDs being studied are reportable diseases, we will be collecting identifying information. Even though the final dataset will be stripped of identifiers prior to release for sharing, we believe that there remains the possibility of deductive disclosure of subjects with unusual characteristics.

Thus, we will make the data and associated documentation available to users only under a *data-sharing agreement* that provides for:

- (1) a commitment to using the data only for research purposes and not to identify any individual participant;
- (2) a commitment to securing the data using appropriate computer technology; and
- (3) a commitment to destroying or returning the data after analyses are completed.



thank you!

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