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TO: National Institutes of Health Office of Science Policy

FROM: The Society of Toxicology (SOT)

RE: Draft “NIH Policy for Data Management and Sharing and Supplemental Draft Guidance”

The Society of Toxicology (SOT) is supportive of the draft “[NIH Policy for Data Management and Sharing and Supplemental Draft Guidance](#).”ⁱ SOT strongly agrees that an open data policy:

- Promotes transparency in science.
- Allows for independent data validation.
- Facilitates the re-purposing of valuable data to support novel research at a cost-savings.
- Allows for the possible combining of data sets to answer questions that historically were difficult to approach because of limited resources.

Consistent with the February 22, 2013, Holdren memorandumⁱⁱ outlining important principles for a federal open data policy, SOT urges NIH to maintain a 12-month embargo on making publications and any underlying data publicly available. Such a practice will be critical for maintaining the long-term successful partnership between the scientific community and the publishing industry.

The Society is pleased that the NIH draft policy recognizes the value and challenges associated with making data from studies with human volunteers publicly accessible and is proposing that costs associated with anonymizing such data be an allowable expense. However, given the complexities and importance of anonymizing such data, SOT urges NIH to consider developing a centralized resource that would be made available to achieve this goal in a reproducible, reliable, and rigorous manner. Developing such a resource as a cross-agency effort may serve a wide scientific audience.

ⁱ “NIH Data Management and Sharing Activities Related to Public Access and Open Science,” National Institutes of Health Office of Science Policy, updated November 2019, <https://osp.od.nih.gov/scientific-sharing/nih-data-management-and-sharing-activities-related-to-public-access-and-open-science/>.

ⁱⁱ John P. Holdren, Director of the US Office of Science and Technology Policy, to the Heads of the Executive Departments and Agencies, memorandum, February 22, 2013, “Increasing Access to the Results of Federally Funded Scientific Research.” https://obamawhitehouse.archives.gov/sites/default/files/microsites/ostp/ostp_public_access_emo_2013.pdf