



Overview

This resource is intended to assist University researchers and administrators in navigating the National Institutes of Health (NIH) requirements for Data Management and Sharing (DMS) Plans, specifically highlighting the transition to a streamlined format effective in 2026.

Overview of NIH DMS Policy

The NIH requires a DMS Plan for any funded research that generates scientific data. Plans must reflect the proposed approach at the time of preparation and be updated throughout the project's life cycle. NIH strongly encourages practices that align with FAIR principles (Findable, Accessible, Interoperable, and Reusable).

Upcoming Changes (Effective May 25, 2026)

To address common confusion and minimize extraneous details, NIH is launching a pilot format for DMS Plans.

[2026 Update Preview: Data Management and Sharing Plan Format Page \(OMB Clearance Pending\)](#)

For due dates on or after May 25, 2026, applicants must use a simplified format page consisting of the following elements:

[Element 1]: Maximum Sharing

A "Yes/No" confirmation of whether scientific data underlying peer-reviewed publications and other findings will be shared to the maximum appropriate extent.

[Element 2]: Timeline

A "Yes/No" confirmation that data will be shared by the time of publication or by the end of the performance period (including no-cost extensions).

[Element 3]: Duration

A "Yes/No" confirmation that data will be available for at least as long as required by repository or journal policies.

[Element 4]: Justification for Limitations:

If you answered "No" to elements 1, 2, or 3, you must describe the ethical, legal, or technical factors limiting sharing (300 words maximum).



Upcoming Changes (Effective May 25, 2026): continued

[Element 5]: Human Participant Protections

A "Yes/No" confirmation regarding the protection of privacy and rights for human research participants, including the use of access controls as outlined in [NOT-OD-22-213](#).

[Element 6]: Data Types and Repositories

A table listing key anticipated data types (e.g., species and modality) and the intended repositories (100 words maximum).

Expected Data Type	Established Repository or Example

[Element 7]: NIH Genomic Data Sharing Policy

Studies subject to the Genomic Data Sharing (GDS) Policy must also answer specific questions regarding NIH-designated repositories and Institutional Certification.

Critical Word Limits for 2026 Pilot Plans

To ensure compliance with the new simplified format, please adhere to the following strict word limits for text-based fields:

[Element 4] Justification for Limitations: 300 Words Maximum

If you select "No" regarding maximum sharing, timelines, or duration, you must describe the ethical, legal, or technical factors for these limitations. Your response must specify the particular reason(s) for limiting sharing.

[Element 6] Data Types and Repositories: 100 Words Maximum

This limit applies to the table where you list anticipated data types (species and modality) and your intended repositories. NIH recognizes that not all data types can be anticipated in advance, and omitting a type does not preclude it from being shared later.



Comparison: 2023 Requirements vs. 2026 Pilot Requirements

To help Principal Investigators (PIs) transition to the updated NIH Data Management and Sharing (DMS) requirements, the following table compares the current 2023 standards with the streamlined pilot format effective for applications submitted on or after May 25, 2026.

Feature	2023 Requirements (Current)	2026 Pilot Requirements (New)
Primary Goal	Implementation of mandatory data sharing for all NIH-funded research.	Streamlining and simplifying plans to reduce applicant burden and extraneous details.
Structure	Required multi-element narrative addressing specific NIH elements.	Structured format using six core elements, primarily driven by Yes/No confirmations.
Submission Format	DMS Plan Format Page (DOCX) based on NOT-OD-21-014 .	New Pilot Format Page (PDF/OMB Clearance Pending) consisting of specific prompts and tables based on NOT-OD-26-046 .
Length Controls	No strict word counts; often resulted in plans exceeding recommended lengths.	Strict word maximums for justifications and data type descriptions.
Compliance Focus	Broad approach to data management and sharing at the time of preparation.	Enhanced focus on compliance monitoring through standardized responses.
GDS Integration	Genomic Data Sharing (GDS) often addressed within broader narratives.	Specific GDS-only questions (Element 7) included directly in the format page.

Key Takeaways for Faculty and Staff

- The new format is required for all applications with due dates on or after May 25, 2026.
- The shift toward Yes/No confirmations for maximum sharing, timelines, and duration is intended to clarify common areas of confusion and minimize the "extraneous details" found in previous submissions.
- NIH continues to expect the use of established repositories for preserving and sharing scientific data.