Please consider the following elements when sharing data directly between institutions. Data deposits to registries or repositories may have different considerations.Institutions should adapt these elements as needed to meet their needs related to their institutional policies and procedures.

1. Is a DTUA needed (consult flowchart https://thefdp.org/wp-content/uploads/Flowchart_-Is-a-DTUA-Required-4.pdf)?
2. Can the Provider transfer/share the Data for the Recipient's Purpose?
    a. If applicable, does the Informed Consent Document allow sharing for the Recipient's Purpose?
    b. If applicable, does the IRB approval allow sharing for the Recipient's Purpose?
    c. Do any 3rd party rights attached to the Data impact sharing for the Recipient's Purpose?
        i. Does funding source for Data collection allow sharing?
        ii. Did another entity provide the Data to the Provider? (further sharing will depend on contractual obligations under the originating DTUAs)
3. Does the Provider have concerns about the Recipient that need to be addressed?
    a. Are they a for-profit entity? (note: for-profit entities may be allowed to receive Data, but the FDP template may not be appropriate for these transactions. Other restrictions such as any prohibitions in IRB approval for use for commercial purposes may apply.)
    b. Are they a foreign entity? (note: foreign entities may be allowed to receive Data, pending other restrictions, but the FDP template may not be appropriate for these transactions. Follow institutional policy regarding Export Control issues.)
    c. Is the Recipient otherwise considered a high-risk entity for this transaction? This is determined by institutional policy and practice.
4. What downstream controls must the Recipient comply with?
    a. What type of Data are being shared?
    b. Is Recipient allowed to share Data with other entities? If so, are there restrictions that need to flow down?
    c. Are there Provider institutional policies related to the Data that need to be represented in the DTUA? (e.g. Provider policies on highly sensitive data that are beyond standard regulatory requirements)
    d. Is the Recipient required to provide citations of support in publications?
    e. Are there special controls that the Recipient needs to follow to prevent re-identification at publication or other disclosure? (e.g. cell-size suppression, aggregation)
    f. Does Provider require data security terms other than those in the pre-filled Attachment 2 provided on the FDP website? (If so, FDP DTUA should not be used or implement Attachment 2 - Other)
5. Are there issues with the project scope?
    a. Is the scope provided by PI adequate for Provider to determine if Recipient's use is appropriate?
    b. Has the scope (if presented or edited by Recipient) been validated by Provider PI?