NIH Data Management and Sharing Policy Update

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Jessica's Slides

Impact on NIH Proposal Submissions

- PI will have the option to request assistance via the InfoSheet (for any DMP).

- PI must determine if the proposed research is subject to the DMS policy.

- PI must identify appropriate methods/approaches and repositories for managing and sharing scientific data.

- PI must Develop a Plan for managing and sharing scientific data.

- ** Note that applications subject to both the DMS Policy and the GDS Policy will submit a single Plan.*

Impact on NIH Proposal Submissions

- The DMP will be loaded as a separate file in the proposal submission documents under the Research Plan area.

- The PI will need to develop a budget that supports the costs needed to implement and operate the DMP for the life of the proposal/award.

- On the OU detailed spreadsheet, the DMP costs will be entered under Other Direct Other.

Allowable Costs for DMS

NIH Guide Notice – [Supplemental Policy Information: Allowable Costs for Data Management and Sharing](#)

Reasonable, allowable costs may be included in budget requests for:
- Curating data
- Developing supporting documentation
- Formatting data according to accepted community standards, or for transmission to and storage at a selected repository for long-term preservation and access
- De-identifying data
- Preparing metadata to foster discoverability, interpretation, and reuse
- Local data management considerations, such as unique and specialized information infrastructure necessary to provide local management and preservation (for example, before deposit into an established repository)

Allowable Costs for DMS

NIH Guide Notice – Supplemental Policy Information: Allowable Costs for Data Management and Sharing (cont.)

Reasonable, allowable costs may be included in budget requests for:

- Preserving and sharing data through established repositories, such as data deposit fees. If the Data Management & Sharing (DMS) plan proposes deposition into multiple repositories, costs associated with each proposed repository may be included.

All allowable costs submitted in budget requests must be incurred during the performance period, even for scientific data and metadata preserved and shared beyond the award period.

Example – A DMS plan proposes preserving and sharing scientific data for 10 years in an established repository with a deposition fee, the cost for the entire 10-year period must be paid before the end of the period of performance.

Unallowable Costs for DMS

Budget requests must <u>NOT</u> include:

- Infrastructure costs that are included in institutional overhead (i.e., F&A)
- Costs associated with the routine conduct of research, including costs associated with collecting or gaining access to research data
- Costs that are double charged or inconsistently charged as both direct and indirect costs

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Requesting Funds for DMS

To request funds toward DMS costs, investigators should include:

1. A line item in the budget form

2. A brief summary of the DMS Plan and a description of the requested DMS costs in the budget justification

Investigators whose research projects are also subject to the Genomic Data Sharing (GDS) Policy should also include requested costs for genomic data management and sharing (see NOT-OD-22-198).

Requesting Funds for DMS

All requested direct costs to support the activities proposed in the DMS Plan must be indicated as "Data Management and Sharing Costs" as follows (see NOT-OD-22-189):

- R&R Budget Form: single line item in section F. Other Direct Costs
- PHS 398 Modular Budget Form: as text embedded within the Additional Narrative Justification

A brief summary of the DMS Plan and a description of the requested DMS costs must also be included in the budget justification attachment. The following forms will be updated to reflect the above by Fall 2022: R&R Budget Form: embedded within the section L. Budget Justification attachment PHS 398 Modular Budget Form: embedded within the Additional Narrative Justification

Impact of Changes for Submissions and JIT Actions

The DMP will be evaluated separately from the rest of the proposal submission.

The PI may be contacted for adjustments to the plan or the budget after submission through JIT/award actions.

RPPRs are expected to include updates on DMP actions and coordination with the PO, should changes be proposed.

Mark's Slides