

Guidance on the NIH Data Management and Sharing Policy

NIH has issued the [Data Management and Sharing \(DMS\) Policy](#) effective for all research proposals due on/after January 25, 2023 ([NOT-OD-21-013](#)). Sharing scientific data accelerates biomedical research discovery, in part, by enabling validation of research results, providing accessibility to high-value datasets, and promoting data reuse for future research studies. In general, under the DMS Policy, NIH expects that investigators and institutions will:

- Plan and budget for the managing and sharing of data.
- Submit a DMS Plan for review when applying for funding.
- Comply with the approved DMS Plan.

Considerations:

- Requests should be realistic in relation to the scope and type of the project (see allowable and unallowable costs below).
- **Costs are not expected to be \$0, even when the repository used is free.** There are always expenses associated with data management, preservation, and storage. If proposing \$0, it will need to be well justified.
- The Plan and budget may be reviewed and discussed at the Just-In-Time (JIT) stage. The budget could be reduced if it is determined to be too high but isn't likely to be increased if it is too low.
- **The PI will be responsible for covering the costs of complying with the DMS Plan. If the project budget is not sufficient to cover these expenses, the PI must use another discretionary source of funding (such as their IDC account/indirect return or startup funds).**

Allowable costs (below) must be incurred during the performance period.

Allowable Cost	Example
Curating data	Curation support services via a generalist repository
Development of supporting documentation	Staff efforts needed for long-term document retention
Formatting data to comply with standards or transmitting/storing data to a repository for long-term access	Repository or services center support for data deposits
De-identifying data	Staff efforts to remove identifiers from data, third-party data set review to ensure de-identification, etc.
Preparing metadata to make it discoverable, understandable, and reusable	Staff effort to document appropriate metadata beyond the generation/collection of data (e.g., preparing codebooks)
Unique resources that provide local management and preservation	Cloud storage prior to repository deposit, third-party electronic lab notebook, etc.
Preserving and sharing data using established repositories	Data deposit fees

The following costs are **not allowable** as DMS Costs:

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

Budget Justification

When a DMS Plan is required, you must include a “Data Management and Sharing Justification” within the budget justification. For modular budgets, the Additional Narrative Justification attachment must be included in the proposal with a section titled “Data Management and Sharing Justification”. **This is what reviewers will see; they will not have access to the full DMS Plan.**

The justification should include the requested dollar amount and a brief justification of the proposed activities that will incur costs. Provide a summary of the type and amount of scientific data to be preserved and shared and the name of the established repository(ies) where they will be preserved and shared. Indicate general cost categories such as curating data and developing supporting documentation, local data management considerations, preserving and sharing data through established repositories, etc., including an amount for each category and a brief explanation. **The recommended length of the justification should be no more than half a page.** If no costs will be incurred, enter "\$0" for the requested dollar amount and provide sufficient justification.

Frequently Asked Questions (FAQs):

1. What resources are available to help me draft my DMS Plan?
 - a. NIH’s [Writing a Data Management & Sharing Plan](#) website provides guidance on writing your Plan, and sample plans from various proposal types.
 - b. NIH also provides a [DMS Plan template](#) to help you address all of the required components.
 - c. A free online [DMPTool](#) is also available to assist with the development of your plan (see the [NIH webinar and slides](#) on using DMPTool).
 - d. Learn about NIH’s expectations for [Data Management](#).
2. Where do I upload my DMS Plan?
 - a. Upload your DMS Plan to the PHS 398 Research Plan form in item “11. Other Plan(s)”.
3. For Element 6 of the DMS Plan, who should I say is providing oversight?
 - a. Per Chapman’s [Research Data Ownership, Retention, and Access Policy](#), the Principal Investigator (PI) is responsible for meeting the sponsor’s data management and reporting requirements. Some NIH Institutes & Centers (ICs) may require an institutional official to be listed as the person responsible for oversight of the DMS Plan (i.e., someone not directly involved in the project). In such cases, PIs should work with their School/College to determine the appropriate individual to provide such oversight.
4. Can I change my DMS Plan later?
 - a. At the Just-In-Time (JIT) stage, Program Officers may require specific changes to the Plan prior to funding. Details of the plan should be in writing and approved by NIH.
 - b. Complying with the NIH approved DMS Plan is a term and condition of the award. You will need to follow the plan throughout the life of the award. If adjustments are needed, **prior approval from NIH is required** (contact sps@chapman.edu for assistance with submitting the prior approval request).

5. Are there resources to help me draft my DMS Cost budget?
 - a. NIH's [Budgeting for Data Management and Sharing](#) website provides guidance for budgeting and justifying costs associated with meeting the new data sharing requirements.
 - b. NIMH provides a [DMS Cost Estimator Tool](#), but you may want to budget 2-3x as the calculator has been known to underestimate the true costs.
6. What should I think about when developing my DMS Cost budget?
 - a. Is there a deposit fee for any repositories you are using, and do they allow pre-payment?
 - b. Will you need dedicated research staff time or a service center/vendor to support data management and sharing activities to meet repository requirements?
 - c. Where will you store data while the project is active, and is there a fee?
 - d. Are there fees for any data collection/analysis tools or software?
 - e. Do you have subrecipients and will they be responsible for data management and sharing and have they budgeted for it appropriately?
 - f. Will there be any expenses related to data management and sharing after the period of performance?
7. Do I have to budget DMS Costs if Chapman is a subaward site on another institution's proposal?
 - a. If you/Chapman will be responsible for any of the data management and sharing activities described in the prime applicant's DMS Plan, then you should budget for the associated costs.
8. I didn't budget enough to cover the costs of complying with my approved DMS Plan. Can the Office of Research & Graduate Education cover those expenses?
 - a. No. The PI is responsible for covering the costs of complying with the DMS Plan. If the project budget is not sufficient to cover these expenses, the PI must use another discretionary source of funding (such as their IDC account/indirect return or startup funds).

Where to Go for More Help:

- See [slides](#) and [video](#) from our December 2022 DMS Policy webinar and our [NIH Data Management and Sharing Policy at 1 Year](#) presentation from March 2024 (note that the 2% DMS Cost requirement is no longer in effect).
- For help with preparing your application, budgeting for DMS Costs, requesting prior approval to change your DMS Plan, contact our Sponsored Projects Services team at sps@chapman.edu.
- For questions about costs related to information, security, and technology services necessary for your data management and sharing, contact [IS&T](#).
- For guidance on fine-tuning your DMS Plan (e.g., questions about data standards, describing findability of data, selecting a repository, etc.), contact Andrew Greenman (agreenman@chapman.edu) at the Leatherly Libraries.

Other Information for Researchers:

- [Leatherly Libraries – Data Management & Sharing LibGuide](#)
- [Desired Characteristics of Data Repositories for Federally Funded Research](#)
- [Changing the Culture on Data Management and Sharing](#)
- [Responsible Data Management \(ACM\)](#)
- [Taking the pain out of data Sharing \(Nature\)](#)
- [Ten simple rules for maximizing the recommendations of the NIH data management and sharing plan \(PLOS\)](#)
- [Memorandum from OSTP on: "Ensuring Free, Immediate, and Equitable Access to Federally Funded Research"](#)
- [FAQs for the NIH Policy for Data Management and Sharing](#)