

## Budgeting tips for the new NIH Policy on Data Management and Sharing (DMS)

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Questions?

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Subject: NIH Data Mandate/DMP

Effective January 25, 2023, the National Institutes of Health (NIH) is implementing a new [Policy for Data Management and Sharing \(DMS Policy\)](#). Costs associated with data management and sharing should be included in grant budgets and explained in the justification section of the application.

**Allowable costs (below) submitted in the budget must be incurred during the performance period.**

<u>Allowable Cost</u>	<u>Example</u>
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 service center support for data deposits
De-identifying data	<ul style="list-style-type: none"><li>• Staff efforts to remove identifiers from data</li><li>• Third-party data set review to ensure de-identification</li></ul>
Preparing metadata to make it discoverable, understandable, and reusable	Staff effort to document appropriate metadata beyond the generation/collection of data
Unique resources that provide local management and preservation	<ul style="list-style-type: none"><li>• Cloud storage prior to repository deposit</li><li>• Third-party electronic lab notebook</li></ul>
Preserving and sharing data using established repositories	Data deposit fees

The following costs are **not allowable**:

- Infrastructure costs
- Routine research costs, such as for collecting and gaining research data access
- Costs that are double or inconsistently charged as both direct and indirect costs

### Questions for the PI

- **Is there a deposit fee for any repositories you're using?** If so, do they allow pre-payment with a single fee, or is the fee recurring annually? (Note: if the fee is annual, it can't be charged to the award after the period of performance.)
- **Will you need dedicated research staff time or a service center/vendor to support data management and sharing activities to meet repository requirements?** These may include data curation, supporting documentation, data formatting, preparing metadata, and de-identifying data.
- **Where will you store data while the project is active, and is there a fee?**
- **Are there fees for any data collection/analysis tools or software?**
- **Do you have sub-recipients? Will they be responsible for data management and sharing and budget for it appropriately?**
- **Will there be any expenses related to data management and sharing after the period of performance? If so, how should they be covered?**

## Application Instructions

### R&R Budget

**Before Oct 5, 2023, submission date:** Include direct costs in the Other Costs section in a single line item. Title it: Data Management and Sharing Costs. The only personnel costs allowed are those specific to data management and sharing. Other personnel costs should remain in the personnel section.

**Oct 5, 2023, submission date and later:** The single line-item requirement is eliminated. Include all DMS-related costs in the budget and justification sections.

### 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 is required and must include a section labeled “Data Management and Sharing Justification” followed by the requested dollar amount.)

The justification should provide a summary (no more than a half page), including the type and amount of data to preserve and share and the names of the repositories for each data type. It should also include general cost categories:

- Curation
- Developing supporting documentation
- Local data management activities
- Repository fees
- ...and any other relevant cost categories

This is what reviewers will see. They will not have access to the full DMS plan.

### Research Strategy Approach

The research strategy approach should reference the DMS plan and include how data will be collected, analyzed, and interpreted.

### Other Plans

The completed DMS plan will be attached in a new “Other Plans” section of the application.

### Additional Considerations

- Generally, costs are not expected to be \$0 even if the repository used is free, as there are always expenses associated with data management, preservation, and storage. If noted as \$0, this will need to be justified, as will any other budgeted costs.
- Plan and budget may be reviewed and discussed at JIT. The budget could be reduced if it is determined too high, but generally, it will not be increased if submitted as too low.
- Prior Approval and revised plan will be required if there is a:
  - New scientific direction
  - A change in data repository
  - A timeline revision