NIH’s New Data Management and Sharing Policy Impacts All NIH Applications with deadlines on/after 1/25/2023

The new policy requires NIH proposals submitted on/after 1/25/23 to include a plan for the submission of certain data to a publicly available repository either at the time of publication or the end of the grant, whichever comes first. You can read more details in the policy notice here and in the NIH extramural nexus here. Genomic sharing plans are now included in the data management and sharing plan when they are applicable to the research.

Key takeaways:

- Data sharing (along with open access to research articles) is an important component of open science. Thus, Data Management and Sharing Plans need to become a standard element of research project planning and NIH proposal development.
- The investigator is required to fill out the plan. Research administrators are not able to fill out this form.
- Only use data repositories that meet the prescribed OSTP and NIH standards.
- Data sharing/open data activities tend to carry costs (because free, open generalist repositories may be insufficient for all needs) and those costs—along with a Data Management and Sharing Plan—need to be included as part of all grant applications, as part of the direct costs budget.

Data Management and Sharing Plan (DMSP)

Q: Which proposals will require a DMSP?
A: DMSPs will be required for all research proposals (Rs), certain Career Development Awards (Ks), small business programs (SBIR/STTR), and research centers (Ps and Us). DMSPs will not be required at this time for training grants (Ts), fellowships (Fs), certain non-research career awards (KM1), construction (C06), conference grants (R13), and research-related infrastructure programs (e.g. S06).

Q: Where is the DMSP uploaded in the proposal?
A: The DMSP will be part of the PHS 398 Research Plan. It will need to be uploaded in the “Other Plans” section 11 as its own document (separate from Resource Sharing Plan). Please see this screen shot of the application form.

Q: Is the DMSP provided to the NIH study sections?
A: The DMSP will be reviewed by NIH program staff and is not part of the peer review score. NIH will review the DMSP during Just-in-Time requests.

Q: What is the DMSP format?
A: A sample format is provided by the NIH and is available here. The DMSP is limited to two pages and includes 6 key elements (Data type: Identifying data to be preserved and shared; Related tools, software, and code: Tools and software needed to access and manipulate data; Standards: Standards to be applied to scientific data and metadata; Data preservation, access, and timelines: Repository to be used, persistent unique identifier, and when/ how long data will be available; Access, distribution, and reuse considerations: Description of factors for data access, distribution, or reuse; Oversight of data management and sharing: Plan for how compliance will be monitored/ managed and by whom).
Q: What should be included in the DMSP?
A: Investigators are encouraged to use NIH’s instructions on Writing a Data Management and Sharing Plan to fill out the template. This page describes NIH’s expectations as to which items investigators should consider as they develop their plan.

Q: The last section of the DMSP asks about institutional oversight. What should I enter in this section?
A: At Tufts University, compliance with the DMSP will be overseen by relevant units at the department, school, and central levels, including Tufts Technology Services, the Office of the Vice Provost for Research, and departmental- and school-based administrative leadership. Compliance oversight is performed annually at the time of submission of the RPPR, at a minimum.

Q: What are the existing data repositories that can be used?
A: Many RFAs list specific repositories and some NIH ICs have general repositories. NIH provides a filterable list of 70+ repositories. Overall, NIH encourages researchers to select the repository that is most appropriate for their data type and discipline. See Selecting a Data Repository. In the absence of an acceptable existing repository, state that an appropriate repository will be selected without naming a repository.

Q: Should I include data management costs in the budget?
A: Data management costs should be budgeted in the new Data Management and Sharing Costs line item and described in budget justifications. An account code for this new line item is being created in the Tufts systems. NIH clarified that allowable costs include curating data/developing supporting documentation, preserving/sharing data through repositories, and local data management considerations. IMPORTANT: Costs must be incurred during the performance period.

Q: What resources are available at Tufts to help me complete the DMSP?
A: Please review the information here: https://viceprovost.tufts.edu/data-management-plan. Tufts is subscribed to the DMP Tool that provides a walk through to build a data plan tailored to specific agency (make sure to log in with your @tufts.edu email). Research Librarians at Tisch Library and Hirsch Health Sciences Library are available for assistance (click on “Talk to an Expert” on the right side of the page to chat or to schedule a consultation). In addition, investigators can reach out to CTSI for assistance via the CTSI portal.

Efforts to provide additional guidance and resources to Tufts investigators are underway.

Links and Resources
Final NIH Policy for Data Management and Sharing
Implementation Details for the NIH Data Management and Sharing Policy
NIH OER Extramural Nexus from August 5, 2022 Implementation Updates for the New NIH Data Management and Sharing Policy
PHS 398 screen shot of the application form
Sample DMSP format
Writing a Data Management and Sharing Plan – learn what NIH expects
Repositories for Sharing Scientific Data
Generalist repositories
Nature's Data Repository Guidance
Registry of Research Data Repositories
Selecting a Data Repository

Tufts information
https://viceprovost.tufts.edu/data-management-plan
Research Data Management at Tufts
DMP Tool
Tufts CTSI Service Request Form.