

## NIH DMSP Budgeting and Application Instructions – Tip Sheet

### Budgeting

- Reasonable, allowable costs directly attributable to the project may be included in NIH budget requests for:
  - Curating data, such as
    - Engaging a generalist repository for curation support services
  - Developing supporting documentation, such as
    - Research personnel effort needed to create and retain appropriate documentation beyond the effort needed to simply generate or collect the data
  - Formatting data according to accepted community standards, or for transmission to and storage at a selected repository for long-term preservation and access, such as
    - Support services that may be offered by the repository
    - Engaging a service center for support with data deposits
  - De-identifying data, such as
    - Research personnel effort to systematically remove all identifiers from a data set prior to sharing
    - Engaging a third-party vendor to certify that a data set has been fully de-identified
  - Preparing metadata to foster discoverability, interpretation, and reuse, such as
    - Research personnel effort needed to document appropriate metadata beyond the effort needed to simply generate or collect the data
  - Unique, project-specific information resources necessary to provide local management and preservation, such as
    - Charges from an external vendor for cloud storage prior to deposit into an established repository
    - Costs to use a third-party electronic lab notebook
  - Preserving and sharing data through established repositories, such as
    - Data deposit fees
  - **Note:** All allowable costs submitted in budget requests must be incurred during the performance period.
- **Note:** The following costs are **unallowable** and should not be included in the budget request:
  - Infrastructure costs (these are included in [institutional indirect costs](#))
  - 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
- Questions for Grant Manager to discuss with PI during budget development:
  - Is there a deposit fee for any of the repositories you are planning to use?
    - Does the repository allow pre-payment via a single deposit fee or is there an annual recurring fee? (Note: If an annual fee, fees incurred after the period of performance cannot be charged to the award.)

- Will you need dedicated research personnel time to support any data management and sharing activities to meet repository requirements? If not personnel time, will you need to engage the services of a core/service center or vendor to complete:
  - Data curation?
  - Developing supporting documentation?
  - Formatting data according to accepted community standards or for transmission and storage at selected repository?
  - Preparing metadata?
  - De-identifying data?
- Where are you planning to store the data while the project is active? Is there an associated fee?
- Is there a fee associated with any tools or software you are planning to use to collect or analyze the data?
  - **Note:** If these are necessary for the ordinary conduct of research and not just the data management and sharing activities, they should be budgeted in the appropriate budget category and not in the data management and sharing line item.
- Do you have subrecipients?
  - If yes, will they be responsible and need to budget for data management and sharing activities?
- Are you a subrecipient?
  - If yes, have you discussed with the Prime PI if you will be responsible and need to budget for data management and sharing activities?
- Do you anticipate any expenses related to the DMSP after the end of the period of performance of the award? If so, how should those costs be covered as they cannot be charged to the award?

## Application Instructions

- R&R Budget
  - NEW Per [NOT-OD-23-161](#), NIH has reversed the prior instruction to budget all direct costs needed to support data management and sharing activities in a single line item in the Other Costs section. Effective immediately, all direct costs associated with data management and sharing activities should be budgeted in the appropriate corresponding line item (personnel in the personnel section, equipment in the equipment section, etc.). If there are Other Costs appropriate to include in a Data Management and Sharing Costs line item, reflect these expenses in the Other Costs section with that label. Until the application package is updated in late September 2023 for deadlines on or after October 5, 2023, a line item specifically titled “Data Management and Sharing Costs” (without the quotation marks) must be included in the budget in order to avoid a system error, so if there are no such other costs to include, this line item must still be incorporated into the budget at \$0.

- Budget Justification
  - If a Data Management and Sharing Plan (DMSP) is required, a section clearly labeled “Data Management and Sharing Justification” must be included within the budget justification.
    - For **modular budgets**, the additional narrative justification is required and must include a section clearly labeled “Data Management and Sharing Justification” followed by the requested dollar amount.
  - This section must provide a brief summary of the type and amount of scientific data to be preserved and shared and the name of the selected established repository(ies) for each data type. Even though direct costs associated with data management and sharing activities may be spread across multiple budget categories, this section is required and includes general cost categories needed to implement the DMS Plan as proposed (curation, developing supporting documentation, local data management activities, repository fees, etc.), including an amount for each category and a brief explanation. The recommended length of this section of the justification is no more than half a page. **This summary is what reviewers will be able to review; they will not have access to the full submitted DMSP. This section should communicate to reviewers that the PI has developed an appropriate DMS Plan and understands what will be needed to implement data management and sharing best practices.**
- Research Strategy – Approach
  - This section should include how the data will be collected, analyzed, and interpreted and reference the DMSP as appropriate.
- Other Plans
  - The completed DMSP will be attached in the new “Other Plans” section of the application.
  - **Note:** Please remember that the [NIH hyperlink policy](#) will apply to DMSPs as well, and the final, submitted DMSP should not include any hypertext (e.g., hyperlinks and URLs).
- Anticipated RPPR Questions/Instructions:
  - A new section (C.6 Data Management and Sharing) will be added to the Products section of the RPPR with questions as follows:
    - C.6. a. Has scientific data been generated and shared during this reporting period? Describe activities related to the approved Data Management and Sharing Plan. Enter response below.
    - C.6.b. Are there changes to the Data Management and Sharing Plan?
      - No Change
      - Enter description of change and upload revised Data Management and Sharing Plan
  - **Note:** If a proposal was not required to include a DMSP under the policy in effect at the time the proposal was submitted, the requirement will not go into effect at the RPPR stage, and the PI can indicate that these questions are not applicable.

## Best Practices with Subawards

- When Harvard is the Prime
  - The Harvard PI should discuss roles and responsibilities with regards to data management and sharing activities with any subrecipients while preparing the proposal materials
    - Outline agreed upon roles and responsibilities in Element 6 of the DMSP (Oversight of Data Management and Sharing)
  - Share a copy of the final DMSP with the subrecipient and obtain their approval of the final DMSP prior to submission, ideally as part of the institutionally approved subaward proposal package.
    - Retain a copy of the subrecipient's approval of the DMSP in GMAS with the other proposal documentation from that subrecipient.
    - If the proposal is funded, the DMSP will be incorporated into the resulting subaward agreement, and this will help avoid delays in the subaward process due to disagreement regarding the contents of the DMSP.
  - Any time the DMSP is updated, be sure to confirm the subrecipient agrees to any changes to the DMSP, particularly those that impact the role of the subrecipient in data management and sharing activities.
  
- When Harvard is the Sub
  - Harvard PI should discuss roles and responsibilities with regards to data management and sharing activities with the Prime PI while preparing the proposal materials
    - Outline agreed upon roles and responsibilities in Element 6 of the DMSP (Oversight of Data Management and Sharing)
  - Harvard PI should request a copy of the final (or near final) DMSP from the Prime PI
    - Harvard PI should review DMSP to ensure that the role described for the Harvard team is as expected and achievable
    - Harvard PI should review with their Grant Manager to ensure that appropriate costs related to data management and sharing activities have been included in the Harvard budget.
    - Grant Manager should upload a copy of the PI-reviewed DMSP in the GMAS request repository for central review with the other relevant subaward proposal documents.
    - Central reviewer will review DMSP to ensure that roles and responsibilities for the Harvard team are clearly articulated in Element 6 (Oversight of Data Management and Sharing)
      - ☐ If roles and responsibilities are unclear, provide this feedback to the Harvard PI and recommend the DMSP be updated to include this prior to submission. Approval of the subaward proposal **does not** need to be held waiting for these revisions.
    - Both DMS-related questions in GMAS should be answered "yes".

- In the event that information on the DMSP cannot be obtained from the Prime PI or it is otherwise unclear if the Harvard team will have any responsibility for DMSP activities, the first DMS-related questions in GMAS should be answered “Yes” and the second should be answered “No”
  - Approval of the subaward proposal **does not** need to be held waiting for a copy of the DMSP.
  - If the proposal is selected for funding, a copy of the final DMSP must be obtained prior to execution of any resulting subaward agreement.
- If a subaward agreement is received as a result of the proposal, the central reviewer will review the incoming subaward agreement to ensure that the final DMSP is included in the agreement package.
  - The central reviewer will review DMSP to ensure that
    - roles and responsibilities for the Harvard team are clearly articulated in Element 6 (Oversight of Data Management and Sharing)
    - the DMSP in the subaward agreement is the same as the one received during the proposal stage (if one was received at that stage)
  - If either of the above is not true, the central reviewer will work with the Harvard PI to review and/or request changes to the DMSP, as appropriate, prior to execution of the subaward agreement.
  - If both of the above are true, the central reviewer’s review of the DMSP is complete.