NIH Data Management & Sharing:

Six Months In

June 2023 COGR Meeting

Moderator:

Krystal Toups, COGR, Contracts & Grants Administration

Presenters:

Christi Keene, University of Chicago/FDP

Melissa Korf, Harvard Medical School/FDP

Jim Luther, Yale University/FDP

Michelle Bulls, NIH, Office of Policy for Extramural Research Administration (OPERA)

David Kennedy, COGR, Costing & Financial Compliance

Progress
"It's a marathon…."

- Community Effort (Inst., NIH, FDP, ARL, COGR)
- *Expanding Resources and Tools*
- *Advocacy & Engagement (Budgeting & Costing, DMS templates*
- *More to come:*
  - *Reviews &JITs, Culture Change, Award Management*

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Data Mgt & Sharing Resource Page

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NIH Data Management and Sharing Policy Resource Page

On October 29, 2020, NIH issued its Final Policy on Data Management and Sharing, effective for grant and contract applications submitted and other funding agreements executed on or after January 25, 2023. The Policy was issued to promote the management and sharing of scientific data generated from NIH-funded research, and established requirements for submission of Data Management and Sharing plans and compliance with ICO-approved plans. In addition to the Final Policy, NIH also released several supplemental notices and FAQs, and we have seen some ICOs release their own policies as well. COGR, working closely with colleagues from FDP, ARL, AAU, APLU, and others, has convened a workgroup of association and institutional representatives to assess and provide guidance on the Policies and their effect on the research community, analyzing the cost of compliance to research institutions and faculty, and advocating for harmonization where possible and articulating where clearer guidance is needed in a variety of areas. If you have any questions about this effort, please contact David Kennedy, Director of Costing and Financial Compliance at dkennedy@cogr.edu.

NIH Policies, Supplements, & FAQs NEW NIH Data Sharing Info Website

COGR Readiness Guide Latest Chapter

Comment Letters to NIH

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Agenda

FDP NIH Data Management and Sharing Pilot	*Michelle Bulls* *Melissa Korf*	*Christi Keene* *Jim Luther*
NIH Implementation	*Michelle Bulls*	
Results from the COGR Survey	*David Kennedy*	

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FDP Pilot

Pilot Background

- Under the new NIH Policy for Data Management and Sharing, each NIH Institute, Center, and Office (ICO) has the flexibility to develop more specific requirements to best meet the needs of the particular field(s) it funds; however, significant variation in ICO-specific requirements will place substantial administrative burden on researchers to first navigate the varying requirements before they can begin developing their DMS Plan.
- The FDP NIH DMS Pilot is an FDP and NIH collaboration engaging NIH ICOs, Office of Extramural Research SMEs, the Office of Science Policy and OPERA/Compliance which aims to:
  - Generate greater consistency in DMS Plan requirements across NIH ICs and programs and
  - Mitigate the administrative burden for researchers associated with DMS Plan development and implementation.

Pilot Phases

- Phase 1: NIH DMS Plan Template Pilot
  - We will test the effectiveness and usability of two DMS Plan templates developed in collaboration with representatives from participating ICs:
    - **Alpha Template** is a prescriptive template designed to limit the need for free text entry
    - **Bravo Template** aims to provide detailed prompts as well as more options to include free text responses as necessary.
  - We will gather data from the researcher/faculty perspective as well as the NIH program perspective.
- Phase 2: Cost Policies
  - Establish common cost principles, identify types of costs required, and determine how to identify additional/unforeseen costs that may be required to meet the spirit of the data sharing policy.
  - Planning phase beginning now with pilot phase anticipated to begin December 2023

Updates on Phase 1: DMS Plan Templates

- Phase 1 kicked off March 1, 2023
- 20 institutions have formally agreed to participate
  - Additional institutions would like to share the templates with their faculty but could not fulfill all the obligations of participation
- Anticipate a slow start in the first quarter with higher usage as we approach the June 5th and July 5th proposal deadlines
- Accepting new participating organizations now
  - Email NIHDMSPilot@thefdp.org if interested in joining!

Value of Participation

- Both templates have been designed in consultation with NIH program staff to ensure all the information needed to review and approve the DMS Plan is easily and clearly provided
- The standardized template format reduces the need to draft extra text to conform to a more narrative format
- Have a seat at the table with NIH colleagues during the refinement of an NIH DMS Plan template

Round Tables

- Smaller group discussions focused on the experiences of organizations participating in the FDP DMS Pilot.
- By invitation only to manage the number of participants, but all organizations participating in the pilot will be invited to attend at least one.
- Will not be recorded.
- Currently Planned Sessions*:
  - Tuesday, May 16th, 10-11:30 am Eastern ✓
  - Wednesday, June 14th, 11 am-12:30 pm Eastern
  - Thursday, June 29th, 9:30-11 am Eastern

**Additional sessions may be scheduled after September*

Town Halls

- Listening sessions open to a broader audience.
- All are invited.
- Will be recorded, and the recording posted on the pilot webpage.
- Next Session*:
  - Wednesday, May 31st, 1-2:30 pm Eastern ✓
  - Monday, July 17th 10:30 am-12 noon Eastern

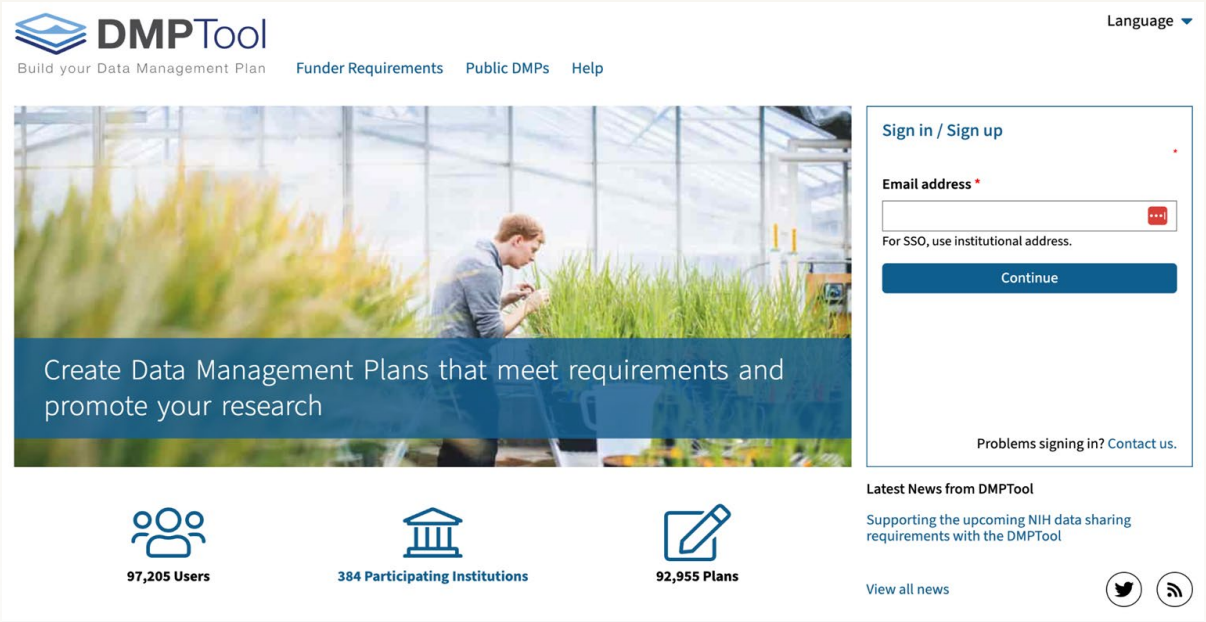
**Additional sessions may be scheduled after September*

Website/Planned Pilot Resources

- Baseline pilot website is available at https://thefdp.org/default/fdp-nih-data-management-and-sharing-pilot/
- Resources to be posted here include:
  - Slides/Video from relevant presentations/meetings
  - Sample Invitation to Faculty to participate in the pilot
  - The pilot DMS Plan templates
  - Institutional Quarterly Report template
  - Preliminary results as they become available
  - Other resources as needs are identified

DMPTool

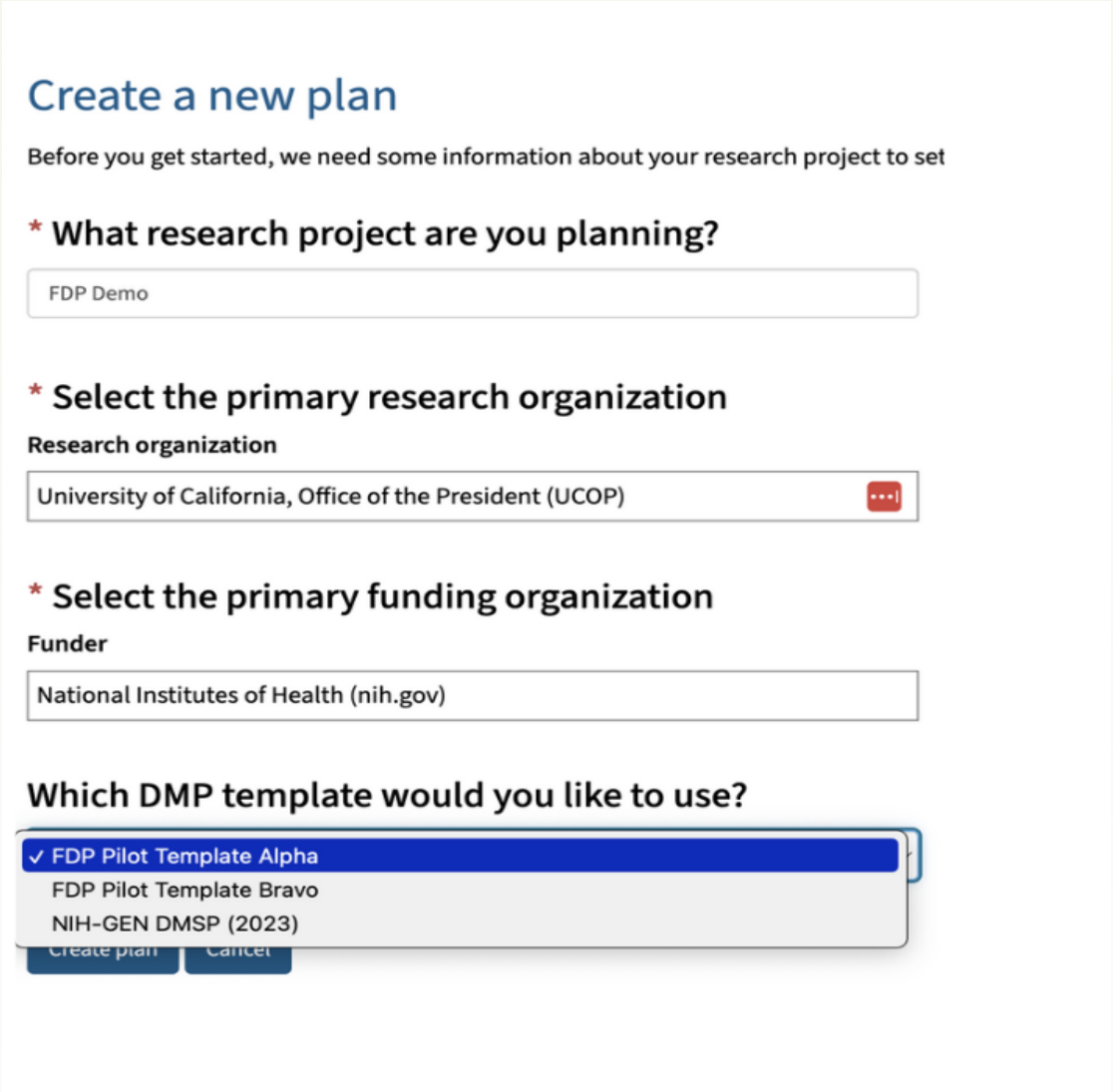
- Free, open source, community-supported application with over ten years of use.
- A communication vehicle that supports data stewardship between librarians and researchers at scale.
- Funder-specific templates that institutions can customize to ensure that their requirements are considered.
- Best practice guidance to ensure DMPs are structured and optimized.
- A mechanism for registering a DMP ID.



Alpha and Bravo templates available NOW in DMPTool

Researchers select NIH as the funder and then will have three options

1. NIH Gen (the DMPTool NIH Wg created this template)
2. FDP Pilot Alpha
3. FDP Pilot Bravo



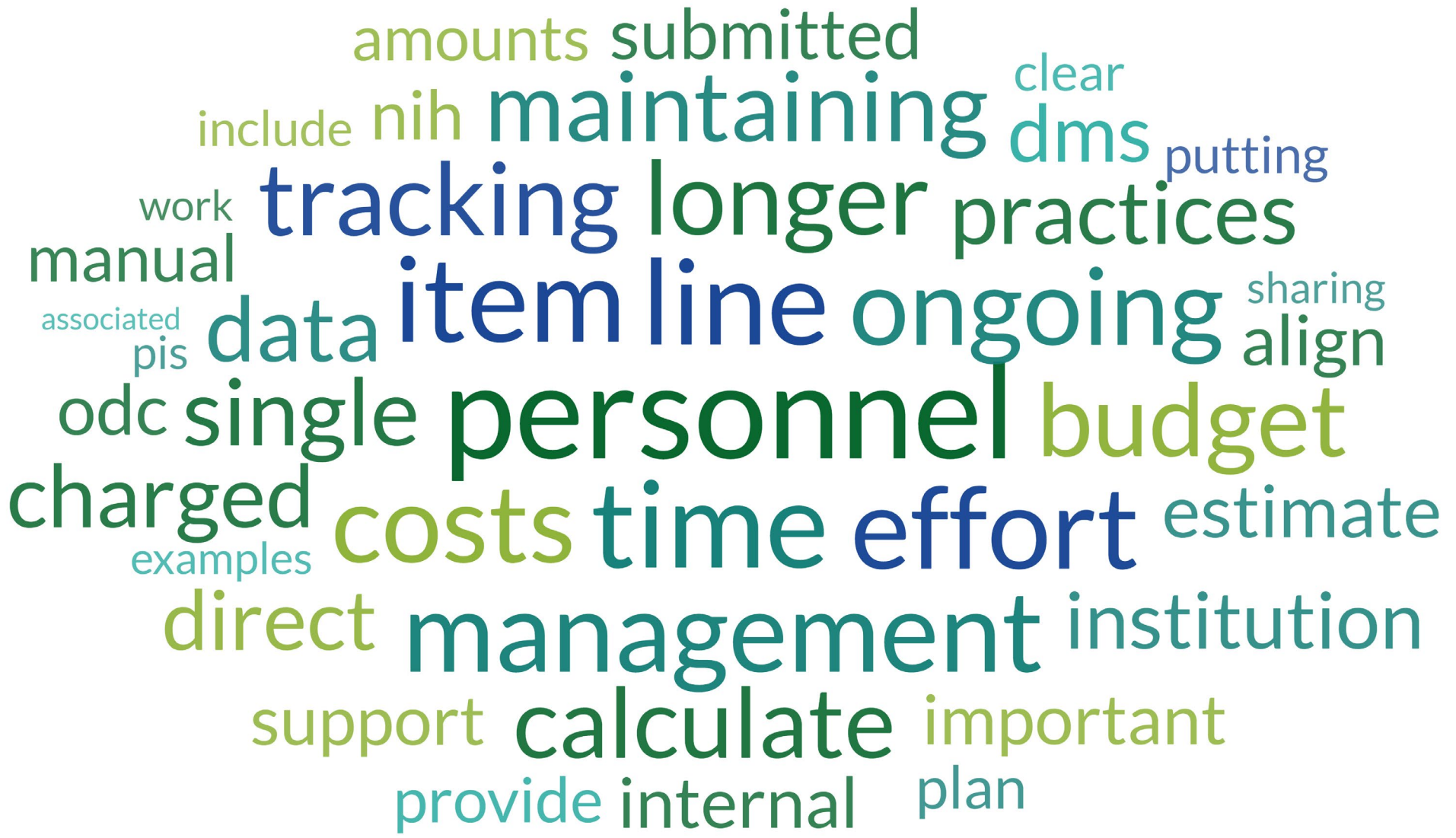
DMPTool features for the FDP Templates

Provide Feedback on Plans: If enabled, users will see a "Request feedback" button on the Share tab while writing their plan. When they click the button, they will receive an automated email notification.

Customize templates: For example, providing customized guidance directing researchers to campus resources.

DMPTool Administrator Guide
bit.ly/DMPToolHelpCenter

Phase 2 Planning: Thought Exchange



Phase 2 Emerging Themes

What challenges, related to budgeting and paying for costs associated with implementation of NIH Data Management and Sharing Plans, can FDP help with?

- Ability to budget accurately
  - Including estimating effort associated with DMS activities (personnel costs)
  - Difficulty estimating now costs that won't be incurred until 5-7 years in the future
  - Costs included in F&A versus direct costs
- Budgeting on a Single Line
- Costs after the end of the period of performance

NIH Implementation/Update

Results from the COGR Survey

Cost of Complying with the New NIH DMS Policy

COGR DMS Survey & Cost Burden

Data Management and Sharing (DMS) and the Cost of Compliance

May 2023

*For mid-size to large research institutions, the annual projected cost impact is expected to exceed $500,000 at the central administrative level, while also exceeding $500,000 at the academic level—**a total impact that exceeds $1 million per institution.***

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The "Cost of Inaction"

For smaller and emerging research institutions, *the cost burden will potentially become prohibitive to their continued participation in the federal research ecosystem …*

For mid-size research institutions, *they will continue to participate, but may choose to retreat from conducting certain types of federally sponsored research …*

For large research institutions, *most likely, they will continue full participation, but even they may choose to restructure the composition of their research portfolios …*

As for faculty, investigators, and those aspiring to be researchers, *the ever-growing administrative burden required to conduct federally sponsored research has and will continue to lead some to seek other careers that are less complicated …*

And for the United States, *our position as the global leader in science and technology will be challenged. Future generations of Americans will bear the cost—a less-creative, less-robust research enterprise that diminishes American ingenuity, imagination, and innovation.*

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… & Advocacy (it's worth repeating)

- Harmonization across agency policies
- Rulemaking via the Administrative Procedures Act (APA), versus rulemaking by FAQ
- Common sense regulation, emphasizing principle over prescription
- 2 CFR Part 200 (Uniform Guidance)—Section 200.100(c): "*The [cost] principles are designed to provide that Federal awards bear their fair share of cost*."
- And as always … partnering, anecdotes, data-driven evidence, and … ultimately, it's all about the science and the research!!!

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Q & A

#COGRJune2023

COGR Point of Contact

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Thank You

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