



July 19, 2024

Ms. Mikia P. Currie, Program Analyst
Office of Policy for Extramural Research Administration (OPERA)
National Institutes of Health (NIH)
6705 Rockledge Drive, Suite 350
Bethesda, Maryland 20892

Re: *Response to NIH Proposed Collection Post-Award Reporting Requirements*

Dear Ms. Currie,

COGR appreciates the opportunity to provide comments regarding the proposed collection to address Data Management and Sharing Plans within the Research Performance Progress Report (RPPR) released in the Federal Register [Proposed Collection; 60-Day Comment Request; Post-Award Reporting Requirements Including Research Performance Progress Report Collection \(OD\)](#), Notice dated May 22, 2024 (Document Citation: 89 FR 45000).

COGR is an association of over 200 public and private U.S. research universities, affiliated academic medical centers, and research institutes. Our membership is diverse and includes the largest research performers in the nation, as well as smaller and emerging research institutions. We focus on the impact of federal regulations, policies, and practices on the performance of research conducted at our member institutions and advocate for sound, efficient, and effective regulation that safeguards research and minimizes administrative and cost burdens. We understand the importance of being good stewards of federal research funds, and our member institutions work diligently to ensure full transparency and accountability regarding how these funds are used in accordance with federal policies.

The comments presented on the following pages are *ways to enhance the quality, utility, and clarity of the information to be collected* in response to the Notice.

Please contact Krystal Toups at ktoups@cogr.edu if you have questions.

Sincerely,

A handwritten signature in black ink that reads "Krystal Toups". The signature is written in a cursive, flowing style.

Krystal Toups, MBA, CRA
Director, Contracts and Grants Administration

CC: Ms. Michelle Bulls, OPERA, Director

RECOMMENDATIONS

See Appendix I (attached file) for specific section reference

C.5.c Data Management and Sharing

Below is a summary of COGR's review of the proposed DMS questions for Forms-I. In response to the Notice, COGR requested a copy of the data collection plans and instruments from ProjectClearanceBranch@mail.nih.gov. Appendix I contains the copy we received. While we did not receive any accompanying instructions with the form, we have reviewed the questions and provided our interpretation and recommendations.

First Question: *Describe activities related to the approved Data Management and Sharing Plan. For each Data Type identified in the approved DMS Plan, provide the following information as applicable.*

Our interpretation is the question requests that projects under the 2023 NIH Final DMS Policy¹ include each Data Type identified in the approved plan and provide the corresponding DMS Plan information via the dialogue box. However, the options to answer this question are "Applicable" or "Not Applicable," which is confusing and could be interpreted as whether the 2023 NIH DMS Policy applies to the project.

Recommendation: We recommend the following actions to clarify. Delete "Applicable/Not Applicable" and add two radio buttons. The first radio button indicates the applicability of the 2023 NIH Final DMS Policy for the award. We suggest the text: "Completion of this section is not required because either this award is not subject to the 2023 NIH Final Policy on Data Management and Sharing or a Data Management and Sharing Plan was not required for this mechanism." The second radio button to add is to indicate if there is anything to report. We suggest adding the text "Nothing to Report," which aligns with other response options in the RPPR to indicate there is nothing significant to report during the reporting period.²

Next Question: *If data has not been generated and/or shared as outlined in the approved Plan, describe why, and identify any corrective actions that have or will be taken to comply with the approved plan.*

This question duplicates the information asked in the DMSP information dialogue box (*If data has NOT been shared, what is the status of data sharing?*).

¹ <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-21-013.html>

² See "Nothing to Report" references in the [NIH and Other PHS Agency Research Performance Progress Report \(RPPR\) Instructional Guide](#)

Recommendation: We recommend deleting this question as it is duplicative. However, if the intent of this question is an overall status of DMS activities, we suggest the question be re-worded as follows: “Describe any challenges or delays in implementing the approved DMS Plan encountered during the reporting period and actions or plans to resolve them.”

Following Question: *Are significant prospective changes to the Data Management and Sharing Plan being requested for the coming year (e.g., change in repository, change in timeline, or change in scientific direction)?*

We interpret this question and the corresponding questions to inquire if there are any proposed changes to the approved DMSP. If so, briefly describe the change and upload a revised DMSP.

Recommendation: No recommendation.

DMSP Information Dialogue Box: *Data Management and Sharing Plan Information*

Our interpretation is that this dialogue box is to be completed for each data type identified in the approved plan.

Recommendation: Given that some projects may have multiple data types, we recommend using a drop-down box with categorical selections consistent with those utilized in DMS Plan templates instead of a text box to facilitate ease of completion. This approach will also aid NIH’s analysis of the data collected. Additionally, because an appropriate repository may not exist for all data types, we recommend revising the “Repository” header to read “Repository/Database”. Also, given that a Persistent Unique Identifier is not specifically required under the policy and may not be feasible in all cases, we recommend revising the “Unique Identifiers/Digital Object Identifier (DOI)” header to read “Persistent Unique Identifier or other standard indexing tool used.” Finally, if this information needs to be populated annually, we suggest it automatically roll over to the next progress report to streamline the process.

Additional Recommendation:

While we focused our response on section C.5.c, Data Management and Sharing, we noted references to data sharing in the Resource Sharing section (C.5.b). We recommend removing this reference and providing clear instructions that information related to the 2023 NIH Final DMS Policy should be addressed in section C.5.c.

Conclusion:

Our review of the proposed DMS questions for Forms-I emphasizes the necessity of refining the RPPR questions to ensure clarity and accuracy in completion. Clear instructions on the new reporting requirements are essential for researchers. We welcome the opportunity to address any follow-up questions and are eager to collaborate on further improvements.



Data Management and Sharing Plan Information ✕

Data Type *

ex: Scientific data

2000 characters remaining

Has data been generated to date? * **Has the data been shared?**
(i.e. made available for use by others)

Yes No Yes No

If data has NOT been shared, what is the status of data sharing?

e.g., Being prepared for submission, submitted to repository, not yet expected to be shared

2000 characters remaining

Repository **Unique Identifiers/Digital Object Identifier (DOI)**

e.g., Datahub eg: ABC12345

2000 characters remaining 2000 characters remaining

Cancel Add DMSP Information

Filter Table 4 Results
1 of 1

Data Type	Has data been generated to date?	Has the data been shared?	Status of Data Sharing	Repository	Unique Identifiers/ Digital Object Identifier
Metadata	Yes	Yes	Shared	NIH Data Hub	123456987
Preserved and shared Scientific Data	Yes	No	Being Prepared for submission	Not Applicable	Not Applicable
Scientific Data	No	No	Not yet expected to be shared	Not Applicable	Not Applicable

Comments (optional) *

Comments (optional) *

▼ C.5 Other products and resource sharing

C.5. a Other Products

Identify any other significant products that were developed under this project.

For SBIR/STTR Awards commercial technologies will be addressed under Impact

PD/PIs are required to report all products that arise from their NIH award in section C. If there are other products to report not covered in Sections C1 - C4, enter a description for the product and choose the appropriate product category(ies) from the pull down menu (select multiple categories by holding down the

Nothing to Report

+ New Product

C.5.b Resource Sharing

PD/PIs and recipient organizations are expected to make the results and accomplishments of their activities available to the research community and to the public at large. For additional information on NIH Sharing Policies and Related Guidance on NIH-Funded Research Resources see <https://grants.nih.gov/grants/sharing.htm>.

If the initial research plan addressed, or the terms of award require, a formal plan for sharing final research data, model organisms, Genome Wide Association Studies data, or other such project-specific data, describe the progress in implementing that plan. For sharing model organisms, include information on the number of requests received and number of requests fulfilled during this reporting period. If the sharing plan is fully implemented, provide a final statement on data sharing.

Nothing to Report

Progress implementing the resource sharing plan

ex:

8000 characters remaining

C.5. c Data Management and Sharing

Describe activities related to the approved Data Management and Sharing Plan. For each Data Type identified in the approved DMS Plan, provide the following information, as applicable:

Applicable Not Applicable

+Add DMSP Information

**If data has not been generated and/or shared as outlined in the approved Plan, describe why, and identify any corrective actions that have or will be taken to comply with the approved plan.*

Description

2000 characters remaining

Are significant prospective changes to the Data Management and Sharing Plan being requested for the coming year (e.g., change in repository, change in timeline, or change in scientific direction)?


No Change

If yes, enter description of the change(s) and upload revised Data Management and Sharing Plan for approval.

Enter description of change

2000 characters remaining

Upload revised Data Management and Sharing Plan

 Drop files to attach, or [browse](#).

Files should not exceed 6MB.

Files can only be the following format: pdf