

Budgeting for Data Management and Sharing

Since GCO's original communication was released on November 30 (see below), we are also including here important updates and removing old information. These updates have been released on the listserv as well.

1. [Elimination of Single Line Item for DMS Plan](#)
2. [Asking for No Money in your DMS Plan?](#)
3. [Budget Development Questions to Prompt Inclusion of All Relevant Costs](#)
4. [GCO's Original Communication on Budgeting for Data Management and Sharing](#)

1. Elimination of Single Line Budget Item for DMS Plan

Effective for applications submitted for due dates on or after October 5, 2023, NIH will no longer require the use of the single DMS cost line item. NIH recognizes that DMS costs may be requested in many cost categories. Therefore, in line with NIH's standard budget instructions, DMS costs must be requested in the appropriate cost category, (e.g., personnel, equipment, supplies, and other expenses) following the instructions for the R&R Budget Form or PHS 398 Modular Budget Form, as applicable.

While the single cost line item is no longer required on the budget, NIH will require applicants to specify estimated DMS cost details within the "Budget Justification" attachment of the R&R Budget Form or "Additional Narrative Justification" attachment of the PHS 398 Modular Budget Form, pursuant to the instructions. See [NOT-OD-23-161: NIH Application Instruction Updates Data Management and Sharing \(DMS\) Costs](#) for complete information.

2. Asking for No Money in your DMS Plan?

Although we hope we have convinced you that it is 100% proper to request funds for this activity and have guidelines on this as well (please read the GCO-Library communications, "[Budget for Data Management and Sharing](#)," this is a reminder that **if you do not ask for funds, please state so in the budget justification.**

3. Budget Development Questions to Prompt Inclusion of Relevant Costs

Excerpted/adapted from [COGR's Project-Based and Institutional Cost Considerations: Budgeting & Costing Chap. 4.](#)

When developing your budget, some potential questions include:

- Is there a deposit fee for any of the repositories you plan to use?
- Will you need dedicated personnel time to support data management and sharing activities to meet repository requirements? If not personnel time, will you need to engage the services of a core or vendor to complete tasks such as the following:
 - Data curation?
 - Developing supporting documentation?
 - Formatting data according to accepted community standards or for transmission and storage at a selected repository?
 - Preparing metadata?
 - De-identifying data (including data that may require more expensive methodologies to

satisfy de-identification requirements for NIH)? Institutions with units dedicated to de-identification may want to leverage these groups and obtain cost estimates when developing budgets.

- 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 plan to use to collect or analyze the data?

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Preparing and Budgeting to Meet NIH's Jan. 25 2023 Data Management and Sharing Plan Requirement



Research Guidance & Education

Guidance from Kris Alpi, Associate Dean of Libraries & Information Sciences and Allison Gottlieb, Sponsored Programs Education and Communications Director, GCO

This Owl say Hoo and
That Means You.



<https://www.vecteezy.com/free-vector/owl>

Dear Research Community,

We hope you are getting ready for January 25, 2023 NIH competitive grant deadline where the NIH is now requiring information about your data management and sharing plan in your application.

The Money Tree in the Forest



In this communication, we are going to focus on this money tree, in other words, what you need to do to request funds for the DMSP and describe your plans in the budget justification.

Let's review the basics. What is a DMSP? If you aren't sure, read about it [here](#) on the detailed NIH website.

Budgeting for Data Management and Sharing

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Making data accessible and reusable for other researchers may incur costs. You can request funds for these costs in our budget and describe them in your budget justification.

Mount Sinai Tips for Budgeting for Data Management and Sharing

In a half page or less in the budget justification section label this as "Data Management and Sharing Justification," and present the key components of your DMS Plan.

Please be aware peer reviewers may comment on the appropriateness of the budget justification as part of the unscored budget section. Your entire DMSP is 4

only reviewed by the Program Officer.

Justification Required Even if No Funds are Needed

If you do not need funds because you have the active storage space, data curation expertise and/or are depositing the data and/or metadata into a free federal repository recommended by NIH, your justification will address the areas below and say “no funds are needed to support DMS.”

Even if there are no costs, please describe the DMS activities as instructed below in the budget justification.

Data Management and Sharing Justification

1. Briefly summarize the type and amount of data you will create through your research to be managed, preserved, and shared.
2. Name of the established repository(ies) into which you will deposit your data for sharing and whether those are free or have a charge.

a. Data creation/active management (if not budgeted in the project itself)

Example: To preserve all the data for sharing, you need additional local data storage space during the active research stage that is not already provided centrally at no additional charge.

b. Data curation/preparation (e.g. metadata, documentation, de-identification)

Have you mentioned that expertise exists or will be developed within the project staff? If requesting funds for data preparation indicate how the amount was calculated.

c. Data sharing

Give the annual and total charge for storage for at least the minimum Mount Sinai-required six years of retention. Note the storage charges for the entire time of retention and all other DMS charges need to be paid during the period of performance.

The National Academies resource ["Forecasting Costs for Preserving, Archiving, and Promoting Access to Biomedical Data"](#) may be useful when budgeting for DMS costs.

Requesting Funds? Here's the NIH Guidance on Allowable Costs, Forecasting Costs, and Budget Forms You Need to Review

Allowable Costs

Reasonable, allowable costs may be included in NIH budget requests for:

- Curating data
- Developing supporting documentation
- Formatting data according to accepted community standards, or for transmission to and storage at a selected repository for long-term preservation and access
- De-identifying data

- Preparing metadata to foster discoverability, interpretation, and reuse
- Local data management considerations, such as unique and specialized information infrastructure necessary to provide local management and preservation (for example, before deposit into an established repository).
- Preserving and sharing data through established repositories, such as data deposit fees.
- If the Data Management & Sharing (DMS) plan proposes deposition to multiple repositories, costs associated with each proposed repository may be included.

Note that all allowable costs submitted in budget requests must be **incurred during the performance period**, even for scientific data and metadata preserved and shared beyond the award period.

For instance, if a DMS plan proposes preserving and sharing scientific data for 10 years in an established repository with a deposition fee, the cost for the entire 10-year period must be paid before the end of the period of performance.

Unallowable Costs

Budget requests must NOT include:

- Infrastructure costs that are included in institutional [Facilities and Administrative 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

For more information about developing budgets for grant applications, check out the [How to Apply – Application Guide](#).

Requesting and Justifying Costs for Data Management and Sharing

Budget

- Request in the appropriate cost category, e.g., personnel, equipment, supplies, and other expenses.
- Do not combine the separate cost categories (e.g., personnel, equipment, supplies, and other expenses) into one single line item.
- Investigators whose research projects are also subject to the Genomic Data Sharing (GDS) Policy should also include requested costs for genomic data management and sharing (see [NOT-OD-22-198](#)).

Budget Justification

- Include a brief justification of the proposed activities proposed in the DMS Plan that will incur costs.
- Be sure to include a brief summary of type and amount of scientific data to be preserved and shared, the name of the established repository(ies) to be used, and general cost categories.
- The recommended length of the justification should be no more than half a page (see [Application Instructions](#) for details).
- This justification must be labeled as "Data Management and Sharing Justification" and should be included as follows:

R&R Detailed Budget Form: Use the [Budget Justification](#) attachment of the R&R Budget Form.

PHS 398 Modular Budget Form: Use the [Additional Narrative Justification](#) attachment of the PHS 398 Modular Budget Form

Assessment of Budget

On the proposed budget for data management and sharing, peer reviewers may provide comments on the reasonableness of the budget, but these comments will not impact the score.

Peer reviewers will only use the information found in the budget justification to determine whether the requested DMS costs are reasonable and will not be provided with the separate DMS Plan attachment (see [NOT-OD-22-189](#)).

For more information, see NIH's [Budgeting for Data Management & Sharing | Data Sharing](#) webpage or the NIH Guide Notice

Please let us in the [GCO](#) know any questions you may have.

Sincerely,

Allison Gottlieb

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and

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