

# 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
  - Direct costs needed to support data management and sharing activities should be included in the Other Costs section of the budget in a single line item specifically titled “Data Management and Sharing Costs” (without the quotation marks).
  - NIH application instructions indicate that personnel costs specific **only** to data management and sharing activities should be included in the above-referenced line item rather than in the personnel section of the budget. Personnel costs associated with all other project activities should remain in the personnel section.
  - **Note:** To avoid effort monitoring and reporting issues, Harvard guidance is that **all** effort/salary for the **PI(s) and any Senior/Key Personnel** should still be included in the personnel section and not separately listed within the Data Management and Sharing Costs line item. As noted above, effort/salary for other personnel necessary to support data management and sharing activities should be included in the “Data Management and Sharing Costs” line item.
- 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.



## 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.