
*Supercharge Your Compliance Infrastructure: Strategies for
Data Management and Sharing (DMS) Policy Support*

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Outline

- Overview of NIH DMS Policy Requirements
- Learning Objectives
- Questions

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Overview of NIH DMS Policy



Requirement

Beginning **January 25, 2023**, the NIH requires the submission of a Data Management and Sharing (DMS) Plan for all new or competing renewal grant applications for research that generates scientific data, **and** data must be shared at the time of publication or at the end of the award, whichever comes first.

Applicability

The new NIH DMS policy applies to all new projects which meet the following criteria:

- All applications received on or after January 25, 2023
- NIH-supported research regardless of funding level
- Research that results in the generation of scientific data
- It is not retroactive and will not impact current awards

<https://sharing.nih.gov/>

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Learning Objectives

1. Identify administrative infrastructure components that support the NIH Data Management and Sharing Policy

2. Learn how to effectively communicate new policy requirements to researchers

3. Discuss the latest developments with the NIH Data Management and Sharing Policy

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Importance of Administrative Infrastructure

- Spread the word far and wide
- Ensure all researchers understand what is going on
- Manage multiple channels of distribution, communication, and recording of new developments
- Collate feedback and comments made on the submitted DMS Plans at JIT
- Identify potential avenues for compliance monitoring

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Purpose of the Administrative Institutional Readiness Group



Institutional Readiness Group

Ensure readiness for the new NIH Data Management and Sharing (DMS) Policy, and communicate ongoing changes.

- Coordinate activities across business units
- Craft template language for investigators to use in data management and sharing (DMS) plans
- Ensure communication within the UTSW research community

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Institutional Readiness Group Members

- **UTSW Readiness Group Members:**
 - Human Research Protection Program (HRPP)
 - Research & Academic Systems (RAS)
 - Research Integrity Officer (RIO)
 - Research Support and Regulatory Management (RSRM) including (COI, EC, IACUC)
 - Sponsored Programs Administration (SPA)
 - The Library
- New web page on MyUTSW: [NIH DMS Policy Readiness Page](#)
- Dedicated email: DataSharing@utsouthwestern.edu

The screenshot shows the UTSouthwestern Medical Center website. The main heading is "NIH Data Management and Sharing Policy". Below the heading, there is a "Print this page" link and a "Quick Links" section with buttons for "NIH Data Management and Sharing Policy Guidance", "NIH DMS Frequently Asked Questions (FAQs)", "UTSW DMS Frequently Asked Questions (FAQs)", and "UTSW Suggestions for Data Management and Sharing Plans for Animal Study Data". The main text area contains the title "NIH Data Management and Sharing (DMS) Policy" and a sub-heading "Welcome to the NIH DMS Policy Readiness Page!". It mentions that the new NIH DMS Policy went into effect on January 25, 2023. Below the text is a video player titled "NIH Data Management and Sharing (DMS) Policy Readiness" with a play button. The video player shows a person speaking at a podium. To the right of the video player is a "Contact Us" section with an email address and phone number.

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Highlights of Dedicated Web Page

- NIH web site providing general information on the Policy and Data Sharing: <https://sharing.nih.gov>
- NIH developed an [optional DMS Plan format](#) that aligns with the recommended six elements of a DMS Plan:
 1. Data Type
 2. Related Tools, Software and/or Code
 3. Standards
 4. Data Preservation, Access, and Associated Timelines
 5. Access, Distribution, or Reuse Considerations
 6. Oversight of Data Management and Sharing
- In mid-January, NIH provided examples of data management plans or data sharing expectations for the new "optional" DMS Plan template that follows their policy.
 - Just because you follow their examples, does not guarantee acceptance of the DMS Plans.

The screenshot shows a document titled "DATA MANAGEMENT AND SHARING PLAN". It includes a header with the NIH logo and the text "NIH Data Management and Sharing Policy". The document is divided into sections: "Element 1: Data Type", "Element 2: Related Tools, Software and/or Code", and "Element 3: Standards". Each section contains specific instructions and questions for the user to complete. The document is dated "01/25/2023" and "Approved Through 01/31/2026".

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Resources: Institutional Account with DMPTool.org



Creating a DMS Plan in DMPTool.org

- DMPTool is a free, open-source, online application that helps researchers create data management plans
- NIH works with DMPTool.org to disseminate their DMS Plan template and requirements
- DMPTool is easy to use, a webinar about its use was made available on the UTSW NIH DMS Policy web page

UTSW created an institutional account with [DMPTool.org](https://dmptool.org)!

- Single Sign-On (SSO)
- Template language for UTSW PIs to use in their DMS plans was added to DMPTool.org

Selecting an Acceptable Data Repository

NIH Preference on Repositories:

- In general, NIH does not endorse or require sharing data in any particular repository, although some initiatives and funding opportunities will have individual requirements. **Overall, NIH encourages researchers to select the repository that is most appropriate for their data type and discipline.**
- NIH strongly encourages the use of *established NIH-supported repositories* to the extent possible for preserving and sharing scientific data.
 - NIH-supported repository information can be found at sharing.nih.gov

Can't find a repository that suits your data?

- When investigators cannot locate a repository for their discipline or the type of data they generate, a *generalist repository* or *institutional repository* can be used to share data.

NIH's Data Repository Preference

- For some programs and types of data, NIH and/or Institute, Center, Office (ICO) policy(ies) and Funding Opportunity Announcements (FOAs) identify particular data repositories to be used.



Designated Data Repository

- For data for which no data repository is specified by NIH, researchers are encouraged to select a data repository that is appropriate for the data generated from the research project.



Discipline or Data Type Specific
(NIH-supported Scientific Data Repositories)

PubMed Central
(Small datasets as supplementary material)

Generalist Repositories

Institutional Repositories

[Selecting a Data Repository | Data Sharing \(nih.gov\)](#)

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Resources: UT Southwestern Research Data Repository

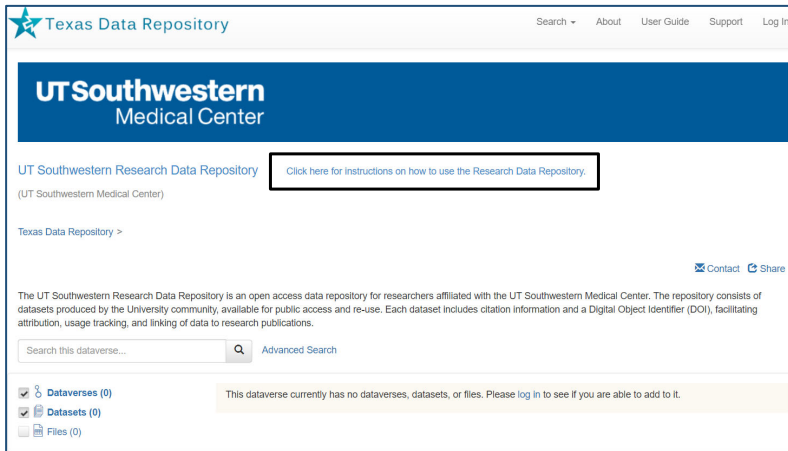
UTSW
Institutional
Repository

- UTSW joined the Texas Data Repository Dataverse and developed the UT Southwestern Research Data Repository.
- This institutional repository gives UTSW investigators an open-access **generalist repository option** that meets NIH's data sharing expectations.
- The repository consists of datasets generated by the University community, available for public access and reuse.
- Each dataset includes citation information and a Digital Object Identifier (DOI), facilitating attribution, usage tracking, and linking data to research publications.

<https://dataverse.tdl.org/dataverse/utswmed>

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UT Southwestern Research Data Repository



Advantages

- Log in with UTSW credentials
- Allow other collaborators to work on dataset before it is published
- Encourage including researcher identifiers (e.g., ORCID)

Limitations

- File upload limit
- No private, confidential, or other legally protected information
- De-identify any personally identifiable information

<https://dataverse.tdl.org/dataverse/utswmed>

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Human Research Protection Considerations

Protecting Privacy: Best Practices

Supplemental Information to the NIH Policy for Data Management and Sharing: Protecting Privacy When Sharing Human Research Participant Data
Notice Number: NOT-OD-22-213

De-identify data

De-identification mechanisms:

- Common Rule (identity cannot "readily be ascertained by the investigator")
- HIPAA (safe harbor or expert determination)

*Warning: information in deidentified datasets **may** allow participants to be identified. Consider modifying information or sharing via controlled access.*

Standardized Data Sharing Agreements

Oversight

- Include assurances that institutional oversight body has reviewed and **considered the risks** of data sharing, ensure that sharing is **consistent with informed consent** (as applicable), and that the **protections in place** are appropriate (such as de-identification, including the standards and methods used).

Responsibilities

- Outline responsibilities of all parties having access to the data and any **data use limitations** including those required by Certificates of Confidentiality, as applicable.

Restrictions

- Outline **sharing limitations**
- **Prohibit attempts to re-identify and/or recontact** participants or their family members unless there is explicit consent to do so

Understand Legal Protections (Disclosure and Misuse)

Consider relevant laws

- Federal, Tribal, state, and local laws may apply to the disclosure and use of data

Understand NIH Certificates of Confidentiality (COC) Policy

- COC **prohibits disclosure** of protected information for non-research purposes except in specific situations (e.g., with consent)
- Data and all copies are covered by Certificates in **perpetuity**

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Choosing a Repository: Points to Consider

Supplemental Information to the NIH Policy for Data Management and Sharing: Protecting Privacy When Sharing Human Research Participant Data
Notice Number:
NOT-OD-22-213

Controlled Access

*Data requesters must verify their identity and the appropriateness of their proposed research use to access data (*Gold Standard)*

1. There are **explicit limitations** on subsequent use (laws, regulations, policies, informed consent, and/or data use agreements)
2. The data are **sensitive**
 - Potentially stigmatizing traits, illegal behaviors, or other information that could cause harm or be used for discriminatory purposes.
 - If data are sensitive, it may be possible to de-identify the data in ways that would allow appropriate sharing.
3. The data **can't be fully de-identified**
 - Some de-identified datasets contain enough information that may allow reidentification of participants
4. There are **unknown risks to participant privacy** if released without controls.
 - Unanticipated approaches or technologies that become known.

Open Access

Available to data requesters without additional restriction

1. Scientific data are **de-identified** AND institutional review has determined that they **pose very low risk** when shared and used.
2. **Participants explicitly consent** to share data openly without restrictions

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Enterprise Box Account

UTSW is pursuing the creation of an Enterprise Box Account, which would provide researchers with an institutional repository option:

- Controlled access
- No limit on storage
- Single Sign-On



<https://www.box.com/>

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Learning Objectives

1. Identify administrative infrastructure components that support the NIH Data Management and Sharing Policy

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Communications Campaign

Prior to January 25th

- Two All Faculty Emails
 - Invite to Informational Session
 - Prior to Implementation
- Faculty Informational Session
- Today@UTSW Newsletter
- Announcements in *Academic Connections*
- SPA Research RoundUp Meeting
- Lab Managers Forum Listserv
- IACUC Listserv
- HRPP Research Matters Meeting
- Provosts & Business Affairs Meeting
- Administrators Meeting
- Clinical Research Update
- HRPP Updates Meeting

After January 25th

- Faculty Senate Meeting
- Institutional Compliance Research and Academics Virtual Office Hours
- IM Department Informational Session
- Executive Compliance Committee Meeting

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Announcements in Campus Newsletters and Listservs

Upcoming Data Management and Sharing Plans

Beginning Jan. 25, 2023, the National Institutes of Health (NIH) will require the submission of Data Management and Sharing (DMS) plans for all new or competing renewal grant applications, for all research that generates scientific data.

The new policy requires that PIs deposit their scientific data in publicly accessible data repositories at or before publication or at the completion of a research project, and that they explicitly describe their plans for how and where their data will be deposited.

An informational session for faculty will be held on Dec. 2 at 9 a.m. in NG3.112. More information is [available online](#) (VPN required). Send questions to DataSharing@utsouthwestern.edu.



RESEARCH Faculty: Attend upcoming data management and sharing plans informational session

Beginning Jan. 25, 2023, the National Institutes of Health will require the submission of Data Management and Sharing (DMS) plans for all new or competing renewal grant applications for all research that generates scientific data.

The new policy requires that principal investigators deposit their scientific data in publicly accessible data repositories at or before publication or at the completion of a research project, whichever comes first; and that they explicitly describe their plans for how and where their data will be deposited.

A faculty-focused informational session will be held on Friday at 9 a.m. in NG3.112. More information is [available online](#) (VPN required). For questions, email DataSharing@utsouthwestern.edu.

Data Management and Sharing Policy

Beginning Jan. 25, the National Institutes of Health will require the submission of a Data Management and Sharing Plan (DMP) for all new or competing renewal grant applications for all research that generates scientific data.

The recording of an informational session for faculty about the new policy, held last month, is now [available online](#) (VPN required). Send questions to DataSharing@utsouthwestern.edu.



to [IACUC-Researchers lists](#)

Retention Policy: No Auto Deletion (50 years)

Dear Investigators:

As previously announced, beginning January 25, 2023, the NIH will require scientific data.

The NIH has partnered with [DMPTool.org](https://dmp-tool.org/) to help researchers create institutional account with DMPTool.org. Also, UTSW has established

NIH DATA MANAGEMENT & SHARING POLICY

Beginning January 25, 2023, the NIH requires the submission of a Data Management and Sharing Plan (DMP) for all new or competing renewal grant applications for research that generates scientific data, and data must be shared the time of publication or at the end of the award, whichever comes first.

The new NIH DMS policy applies to all new projects which meet the following criteria:

- All applications received on or after January 25, 2023
 - NIH-supported research regardless of funding level
 - Research that results in the generation of scientific data
 - It is not retroactive and will not impact current awards
- NIH Preference on Repositories:
- In general, NIH does not endorse or require sharing data in any particular repository, although some initiatives and funding opportunities will have individual requirements. Overall, NIH encourages researchers to select the repository that is most appropriate for their data type and discipline.
 - NIH strongly encourages the use of established NIH-supported repositories to the extent possible for preserving and sharing scientific data.
 - NIH-supported repository information can be found at sharing.nih.gov

RESOURCES

- UTSW Readiness Group includes SPA, RSRN, HRPP, BID, & the Library
- New web page on [UTSW: NIH Data Policy Readiness Plan](#)
- Dedicated Data Sharing email: DataSharing@utsouthwestern.edu
- SPA's web page on [Regulatory Updates](#)

To: lab-managers-foru
Subject: [Lab-managers-foru Informational Session]
Attachments: ATT0001.txt

Good Morning Lab Managers,

The Office of Research Support and Regulatory Management is hosting a Faculty Informational Session regarding the new NIH event with live broadcasting and recording. You may

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UTSW FAQs



NIH Data Management and Sharing Policy The Simplest Possible FAQs

Please visit the [UTSW NIH Data Management and Sharing Policy web page](#). This page will be updated to try to keep up with changes from the NIH.

- 1. What is it?**
The Data Management and Sharing Policy is a new NIH mandate that data obtained using NIH support must be deposited in a publicly accessible data repository. Every new NIH grant application for a project that may generate data must contain a new section describing the PI's Data Management Plan. Some types of grants are exempt, including meeting, training, and equipment grants.
- 2. Who has to submit the new and expanded Data Management Plan (DMP)?**
Anyone submitting an application for a project that will produce data must include a DMP according to the new requirements as of January 25, 2023.
- 3. When?**
The policy becomes effective January 25, 2023.
- 4. Is it only for new grants?**
The policy includes new grants and COMPETING RENEWALS. Annual non-competing renewals are not included.
- 5. What does a DMP contain?**
The DMP is a new two-page section in the NIH grant application. A current draft template for the two-page plan is available [here](#), but changes are likely, possibly as late as January 1. UTSW is preparing a customized template that includes UTSW-specific boilerplate. It will be available on our intranet site when it is ready. Please note that NIH expects to make changes to the current policy and requirements in 2023 and 2024.
- 6. What is meant by "data"?**
The NIH definition of "data" is broad and potentially inconsistent. Read the NIH definition [here](#). UTSW will try to provide more guidance as the time approaches.
- 7. What is a data repository?**
A publicly accessible, on-line data storage facility that will be permanently maintained (or at least until the policy or technology changes). Familiar examples are GenBank and Protein Data Bank. Repositories must be searchable, publicly by subject and depositor, and must be able to assign Digital Object Identifiers (DOIs) to individual bodies of data. NIH lists their preferred data repositories [here](#). These include so-called generalist repositories that can accommodate diverse data types. UTSW is negotiating access to trusted repositories for its researchers. Details will be available in the near future.
- 8. When must data be deposited?**
Data must be deposited at the time a related manuscript is published. Other data that has not been published must be made available at the end of the project period or earlier, depending on NIH requirements for your DMP.

9. What about data on human subjects and animals?
HRPP and IACUC will be providing guidance and DMP boilerplate regarding confidentiality of human subject research and animal research.

10. Will my grant be scored on its data management plan?
No. If the grant is to be funded, the plan will be evaluated for adequacy by program staff and any needed changes will be negotiated at that time. This is a work in progress for NIH; don't sweat the details.

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Impact on Animal Research Subjects Data

- No specific guidance on what type of data must be shared, other than data that is “necessary to validate or replicate research findings.”
- To assist animal researchers, we created suggestions on how to meet NIH’s data sharing expectations while maintaining confidentiality regarding animal research data.
- If data is obtained from images or recordings, the best consideration is to share the quantified data rather than the images and recordings.


Office of Research Support and Regulatory Management
DataShare@UTSouthwestern.edu
 214-646-0554

IACUC
 Tip Sheet

Suggestions for Data Management and Sharing Plans for Animal Study


This tip sheet provides researchers with suggestions about what animal related data should be considered for inclusion in data management and sharing plans (DMSP) based on the [NIH Data Management and Sharing Policy](#).

The use of animals in research can be a sensitive issue and under no circumstances should photographic equipment be taken into UT Southwestern animal facilities without prior approval of the ARC Assistant VP. For additional guidance, please refer to the [ARC Photographing Policy](#).



As a general rule, only share images/videos when the images/videos are the data. If data is obtained from images/videos and documented separately from those images/videos, then share that documented data and [DO NOT](#) the images/videos.

When sharing images of animals that provide data, only share the component of the image relevant to the research.
Example: If a tumor image is data, ensure that the image only shows the tumor and not the entire animal.



Do not share with laboratory animal sources to become familiar with this new NIH policy. It pertains to the collection of images and/or audio recordings that are used to monitor the health of both humans and animals.

You do not need to share the following:

- Animal ID numbers, tattoos, names, or other identifying information. Data can be identified as from “#1,” or “Group 2, An, 3,” etc.
- Images of laboratory notebooks and cage cards. Data found in these items can be transcribed into other documents, e.g. Word or excel documents, and then shared.
- Animal health records, unless they represent research data. This would include room logs, veterinary records, surgery records (including post-op monitoring), and veterinary necropsy reports.
 - o Images or information related to incidental health findings, such as hair loss or fighting injuries in rodents, do not need to be shared.

Do not provide:

- Contact information
- Room or building numbers
- Images of researchers
- IACUC correspondence, including protocol numbers and documents
- Other personal information

December 2022

INSIDE the IACUC

Suggestions for Data Management and Sharing (DMS) Plans for Animal Study Data: Navigating the 2023 NIH DMS Policy

By Nicholas J. Lorenz, PhD, DVM

To have you haven't heard yet, the National Institutes of Health (NIH), which is a single agency, center of governmental research in the United States, has issued a new policy for transparency and the ability to replicate research results in that which have been funded research can be measured. As a continuation of a research effort, the NIH recently announced a policy to require data management and sharing plans for all NIH grant submissions for research that generate data.

Over the next couple of years, the NIH is expected to provide clarification and additional guidance for what is expected in these plans. But, a challenge laboratory animal professionals face is to become with the fairly new requirements to that we can best support our researchers and other animal care staff. In creating data generated by the use of laboratory animals, we will be the first to hear the news. As these plans are given as an overview of the newly implemented policy and how it will affect animal care staff and researchers. Additionally, we will discuss practical advice for the laboratory animal professionals who are responsible when they are designing their plans to submit their grant applications.

As you prepare within laboratory animal sources to become familiar with this new NIH policy, it pertains to the collection of images and/or audio recordings that are used to monitor the health of both humans and animals.

You do not need to share the following:

- Applications for images shared on or after January 21, 2023.
- NIH supported research regardless of whether the results in the generation of scientific data.

What animal research data should be shared?
 The collection of the new policy is the requirement that a proposed data management and sharing plan (DMSP) be included in all grant applications where the research will result in scientific data. In the DMSP the investigator must review the data that will be generated and share it with research and animal care staff. The DMSP will be reviewed by NIH staff at the Institute or Center handling the award, and they will not be included in the grant review materials sent to the peer reviewers. NIH has provided some example data management plans, a list of which include animal research. Beyond this, no specific guidance has yet been released as to exactly what type of data must be shared, other than data that is “necessary to validate or replicate research findings.”

Obviously, this will have an impact on the way that animal care staff and researchers plan to share their data. Planning for how animal study data will be shared and stored should be a consideration for all laboratory animal professionals or non-laboratory animal care staff.

In general, when collecting images or video recordings of animals, do not include personal contact information, animal facility names or building numbers, images of employees/researchers, IACUC correspondence, IACUC protocol documents/identifiers, or other personal identifying information. Animal images, recordings, audio and video could be shared when there are

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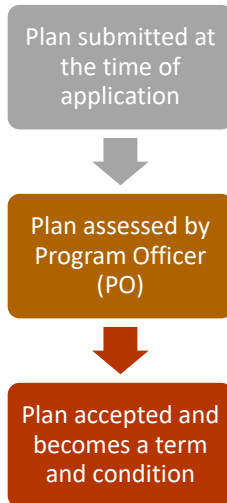
Learning Objectives

1. Identify administrative infrastructure components that support the NIH Data Management and Sharing Policy

2. Learn how to effectively communicate new policy requirements to researchers

3. Discuss the latest developments with the NIH Data Management and Sharing Policy

NIH DMS Plan Assessment



- *Recommended* to be no more than 2 pages
- Program staff ensure the elements have been adequately addressed and assess the reasonableness of those responses
- Any issues with a DMS Plan will need to be resolved through the Just-in-Time (JIT) process

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NIH DMS Plan Approval Process



- DMS Plans may be updated throughout award lifecycle if revisions are necessary (e.g., new scientific direction, a different data repository, or a timeline revision)

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NIH Enforcement



- Non-compliance could result in NIH adding terms and conditions to the award
- Prime institution is responsible for the performance and monitoring activities of the subrecipients and ensuring the DMS Plan is provided and followed
- Failure to comply may result in enforcement action and affect future funding decisions
- NIH will clarify enforcement mechanisms
 - No enforcement actions are expected in calendar year 2023

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Compliance Monitoring for Institutions



- NIH has yet to provide succinct guidance regarding oversight and monitoring by an institution
 - No structure exists
 - No suggested institutional corrective actions from NIH
 - No reporting mechanism for institutions
 - RPPR?
- Do institutions need to identify potential avenues for compliance monitoring?

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Survey of Institutional Compliance Monitoring Plans

Institution	FY 22 NIH Funding	Current Plan	Responsibility Institutional Entity (if Provided)
Large University with a Medical School	\$650-700M	Periodic audits of DMS Plans, no current structure for the audit plan	Same group as IACUC/IRB
Large University with a Medical School	\$200-250M	PI or other investigative personnel must be identified on DMS Plan to take responsibility for compliance and oversight	N/A
Academic Medical Center	\$250-300M	PI responsible	N/A
Academic Medical Center	\$150-200M	No guidance	N/A
Academic Medical Center	\$150-200M	No guidance	N/A
Large University with a Medical School	\$50-100M	Post-Approval Monitoring or PI	Human Research – IRB Animal Research – IACUC Other Research – PI
Medium University with a Medical School	\$50-100M	Deferred any oversight/compliance questions to the Library	Library
Medium University with no Medical School	\$10M	PI is ultimately responsible but will implement a risk-based audit approach	Sponsored Projects
Large University with a Medical School	\$<10M	No institutional guidance	Individual academic departments
Large University with a Medical School	\$<10M	PI responsible	N/A

Many institutions indicate that they are in a “holding pattern” and not implementing any compliance monitoring without further NIH guidance

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Monitoring Components for an Institutional Process

- What is being shared
 - Appropriate data from the relevant studies identified in DMS Plan
- When is it being shared
 - Shared on or before publication ← **Difficult to do prospectively**
 - Non-published data shared before award close-out ← **UTSW Policy: 90-120 days after project period ends**
 - Other time points in the DMS Plan – **Not encouraged**
- Justifications for not sharing data followed
- How is data shared
 - Repositories identified in DMS Plan
- Appropriate reporting of data sharing progress in RPPRs

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Monitoring Components for the HRPP

- What is being shared
 - Appropriate data from the relevant studies identified in DMS Plan
- When is it being shared
 - Shared on or before publication
 - Non-published data shared before *protocol* close-out
 - Other timepoints in the DMS Plan?
- Justifications for not sharing data followed
- How is data shared
 - Repositories identified in DMS Plan
- Appropriate reporting of data sharing progress in RPPRs

Consistent with informed consent and IRB requirements

May not correspond to award close-out

Potential Institutional Monitoring Options (in order of effort/burden)

1. No monitoring by the institution, PI completely responsible
2. *Ad hoc* monitoring at close-out or at other triggers (e.g. first manuscript publication)
3. *Ad hoc* monitoring during award period and review at all close-outs
4. Reviews at RPPR (annual)
5. Reviews at RPPR (annual) and close-out
6. Reviews at RPPR, manuscript review, and close-out
7. Reviews at RPPR, timepoints in the DMS Plan, manuscript publication, triggers, & close-out

Additional options:

- IRB reviews as part of QA
- IACUC reviews with PAM

Our Challenges

- Access to DMS Plans and RPPRs in eResearch
- Changes expected to NIH policy guidance in 2024 and beyond
- Resources with appropriate expertise and increased workload (e.g. HRPP)
- Need for a closed repository for human research data
 - Institutional agreements may be needed for external closed repositories
- No institutional policy on data sharing
 - Many institutions implemented a policy on data sharing at prior to the NIH policy
- Administrative burden for PIs
 - The more involved the monitoring by the institution, the more PI time will be needed
- Changes to DMS Plans during the award
- Will not receive feedback on first DMS Plans submitted for several months (Feb 5 submissions)

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2023 & 2024

- **Unresolved Items:**
 - Still no guidance on how long data has to be shared
 - Data sharing depends on repository and retention schedule
 - Timeline for cleaning and transformation of data
 - Length of plan is restrictive
 - Look at Intellectual Property (IP) protection before sharing data, rather than before publishing
 - Lack of guidance for oversight and compliance including budget compliance
 - Not been able to track comments for JIT
 - NIH has yet to provide additional budgeting/costing guidance
- NIH is gathering data and feedback through a **Pilot Project** of selected institutions in calendar year 2023
 - Goals of Pilot Project:
 - Test structured templates and tools for DMS Plan submission
 - Establish cost policies and identify types of cost required
- **Institutional Readiness Group** needed to communicate new developments as we navigate through this new requirement

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Acknowledgements

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Questions?



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