



# Changes to NIH Data Management and Sharing Plan Elements

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# Changes to the NIH's Data Management and Sharing Plan Elements

# DMS Policy Overview

## Applicability

All research, funded or conducted in whole or in part by NIH, that results in the generation of "**scientific data**".

See [Research Covered Under the Data Management & Sharing Policy](#)

## Requirements

- ✓ **Submission of DMS Plan** with all applications for funding
- ✓ **Compliance with the DMS Plan** approved by the funding NIH Institute, Center, or Office



# Activities Subject to the DMS Policy

## APPLIES TO...

**All research generating scientific data,** including but not limited to:

- Research Projects
- Certain Career Development Awards (Ks)
- Small Business SBIR/STTR
- Research Centers

## DOES NOT APPLY TO...

**research projects not generating scientific data or non-research projects,** including but not limited to:

- Training (Ts)
- Fellowships (Fs)
- Construction (C06)
- Conference Grants (R13)
- Resources (Gs)
- Research-Related Infrastructure Programs (e.g., S06)

# Compliance/Enforcement

- Extramural Awards: The Plan will become a Term and Condition of the Notice of Award. Failure to comply with the Terms and Conditions may result in an enforcement action, including additional special terms and conditions or termination of the award, and may affect future funding decisions.
- Compliance assessment started in October 2024. Questions were added to Research Performance Progress Report (RPPR) to help determine compliance with Plan

# Compliance/Enforcement

- RPPR Section C.5.c will ask:
  - Whether data has been generated to date and what type of data it is
  - Whether data has been shared for use by others
  - If data has been shared, in what repository and under what unique digital identifiers
  - 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); and
  - If data has not been generated and/or shared as outlined in an approved DMS plan, what corrective actions have been or will be taken to comply with the approved plan.



# Compliance/Enforcer

## C.5.c Data Management and Sharing

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

Applicable  Not Applicable

[+ Add DMSP Information](#)

Filter Table 5 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 ^
array-derived genotype data ***	Y	Y	Shared	Data Hub	ABC1234
Demographic Data ***	Y	N	Data not yet published will share in future	Not Applicable	Not Applicable
Phenotypic and clinical data ***	N	N	Not yet expected to be shared	Not Applicable	Not Applicable

*\*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 here to upload, or [browse](#).

**Max File Count: 1 Accepted File Types: PDF Max File Size: 6MB**

 DMS\_Plan.pdf 

[Cancel](#)

[Save](#)

# Allowable Costs

- **Reasonable costs allowed in budget requests**
  - Curating data/developing supporting documentation
  - Preserving/sharing data through repositories
  - Local data management considerations
- **NOT considered data sharing costs**
  - Infrastructure costs typically included in indirect costs
  - Costs associated with the routine conduct of research (e.g., costs of gaining access to research data)

# Data Management Planning

- Changes to Elements of Data Management Plan

# Components of the current DMP for NIH



Data Type



Related Tools,  
Software and/or Code



Standards



Data Preservation,  
Access, and  
Associated Timelines



Access, Distribution,  
or Reuse  
Considerations



Oversight of Data  
Management and  
Sharing

Components  
of the New  
DMP for NIH  
as of May  
25<sup>th</sup>, 2026



Question 1. Will there be maximum appropriate sharing of scientific data underlying peer-reviewed publications and other findings resulting from the work supported by this award (including preprints, referenced papers reported at conferences, and other findings)? [YES/NO]

Components  
of the New  
DMP for NIH  
as of May  
25<sup>th</sup>, 2026



Question 2. Will the scientific data underlying peer-reviewed publications be shared by the time of publication or, for other findings, by the end of the period of performance, which includes no-cost extensions? [YES/NO]

Components  
of the New  
DMP for NIH  
as of May  
25<sup>th</sup>, 2026



Question 3. Will shared scientific data be made available for at least as long as required by applicable data repository policies and/or journal policies?  
[YES/NO]

Components  
of the New  
DMP for NIH  
as of May  
25<sup>th</sup>, 2026



Question 4. If you answered “no” to elements 1, 2, or 3, or if you anticipate that sharing will be limited in some other way, please describe these limitations and the ethical, legal, or technical factors for them (300 words Max)

Components  
of the New  
DMP for NIH  
as of May  
25<sup>th</sup>, 2026



Question 5. If scientific data derived from human research participants will be shared, will privacy, rights, and confidentiality of participants be protected as outlined in [NOT-OD-22-213](#), including whether any scientific data will be shared using access controls?  
[YES/NO]

# Components of the New DMP for NIH as of May 25<sup>th</sup>, 2026



Question 6. In the table below, please list [100 words maximum]:

Key types of scientific data anticipated to be generated during the project, including the species and modality, if known (e.g., “human genomic data,” “rat functional magnetic resonance imaging data”). NIH recognizes that not all data types expected to be generated in the study will meet the definition of scientific data or can be anticipated in advance. If a data type does not appear on the list, it does not imply that that data type will not be shared if it is generated in the study.

The repository or an example of a repository where the scientific data may be managed and shared, if the scientific data is known at time of application. NIH expects the use of established repositories for preserving and sharing scientific data when they are available.

<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-26-046.html>

# Components of the New DMP for NIH as of May 25<sup>th</sup>, 2026



Question 7. For studies subject to the NIH Genomic Data Sharing Policy (GDS) (e.g., using NIH funds to generate large-scale human genomic data):

Will you share all large-scale human genomic and associated data in a NIH-designated repository according to the accelerated timelines expected in the GDS Policy?. If “no,” address in element 4. *[YES/NO/Not Applicable]. If “no,” address in element 4.*

Do you anticipate that when sharing large-scale human genomic data that you will be able to meet the expectations of the Institutional Certification in the GDS Policy (<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-14-124.html>; IV.C.5)? *[YES/NO/Not Applicable]* If “no,” address in element 4.

# RCRA Attestation

2026 SPRING TRAINING  
CONFERENCE & AWARD CEREMONY

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PI Name:  
Project Title:  
Grant #

## NIH Data Management and Sharing Plan Attestation

This document outlines the 8 required elements in the [NIH DMS Policy](#), effective February 25, 2026 for all new grant proposals that generate scientific data.

You must attest that your DMS plan includes are required elements as outlined below and provide a brief description of steps taken to ensure compliance with your NIH approved DMS plan.

Refer to the [NIH Guidance](#) and check for [other data policies](#) outlined by the ICO, specific Request for Applications or Funding Opportunity Announcement, or institutional policies.

Data Management and Sharing Plan Elements should include only the following:

- Will there be [maximum appropriate sharing](#) of scientific data underlying peer-reviewed publications and other findings resulting from the work supported by this award (including preprints, refereed papers reported at conferences, and other findings)? [YES/NO]
- Will the scientific data underlying peer-reviewed publications be shared by the time of publication or, for other findings, by the end of the period of performance, which includes no-cost extensions? [YES/NO]
- Will shared scientific data be made available for at least as long as required by applicable data repository policies and/or journal policies? [YES/NO]
- If you answered "no" to elements 1, 2, or 3, or if you anticipate that sharing will be limited in some other way, please describe these limitations and the ethical, legal, or technical factors for them (see for example [FAQ B.5](#) and other relevant FAQs). Your response should specify a particular reason(s) for limiting sharing. [300 words maximum]
- If scientific data derived from human research participants will be shared, will privacy, rights, and confidentiality of participants be protected as outlined in [NOT-OD-22-213](#), including whether any scientific data will be shared using access controls? [YES/NO]
- In the table below, please list [100 words maximum]:
- Key types of scientific data anticipated to be generated during the project, including the species and modality, if known (e.g., "human genomic data," "rat functional magnetic resonance imaging data"). NIH recognizes that not all data types expected to be generated in the study will meet the definition of scientific data or can be anticipated in advance. If a data type does not appear on the list, it does not imply that that data type will not be shared if it is generated in the study.
- The repository or an example of a repository where the scientific data may be managed and shared, if the scientific data is known at time of application. NIH expects the use of

This guide is intended for educational purposes only and does not act as a substitute for official guidance from the NIH. It is the responsibility of the individual to ensure they understand the NIH Data Management & Sharing Policy, the associated data management and sharing requirements, and their responsibilities as an investigator and/or author. (adapted from Bohman, L, Hertz, M., & Orłowska, D. (2022). Example DMS plans. Working Group on NIH DMSP Guidance. <https://doi.org/10.17605/OSF.IO/JAD9R>)



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established repositories for preserving and sharing scientific data when they are available.

Expected Data Type	Established Repository or Example

- For studies subject to the NIH Genomic Data Sharing Policy (GDS) (e.g., using NIH funds to generate large-scale human genomic data):
  - Will you share all large-scale human genomic and associated data in a NIH-designated repository according to the accelerated timelines expected in the [GDS Policy](#)? If "no," address in element 4. [YES/NO/Not Applicable]. If "no," address in element 4.
  - Do you anticipate that when sharing large-scale human genomic data that you will be able to meet the expectations of the Institutional Certification in the GDS Policy (<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-14-124.html>; IV.C.5)? [YES/NO/Not Applicable] If "no," address in element 4.

NIH websites, FAQs, and other resources are being updated to reflect these new elements.

As part of the 2023 NIH DMS Policy, costs associated with data management and sharing incurred during the performance period can now be charged as direct costs to the grant, contract, or other funding mechanism. These costs are requested via a line item in the Other Direct Costs section of the budget, labeled as "Data Management and Sharing Costs" with a brief summary of the dataset to be shared and a description of the requested DMS costs in the budget justification.

These costs can generally be divided into three main cost categories:

- Personnel Service Fees\* 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
- Repository Fees:
  - Data Deposit fees incurred by preserving and sharing data through established repositories
- Specialized Infrastructure Fees

\*Please note that personnel effort (i.e., calendar months of effort) should not be placed in the Other Direct Costs section. The "Data Management and Sharing Costs" line item within the Other Direct Costs section is for service costs and fees which may include personnel effort as part of an overall service fee (e.g., honest broker services or de-identification services).

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- Local data management considerations, such as unique and specialized information infrastructure necessary to provide local management and preservation during the active phase of research

PI DMS Plan Compliance Description - Briefly describe methods to ensure compliance with your NIH approved DMS plan for above mentioned project.

PI Attestation

I ([PI Name](#)) as Principal Investigator of Project \_\_\_\_\_ attest understanding of the NIH DMS policy and confirm compliance with the DMS plan provided to NIH for above mentioned project.

Signature:

Date:

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# Questions?

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