



January 10, 2020

**Coalition for Academic Scientific Computation
Response to
National Institutes of Health**

DRAFT NIH Policy for Data Management and Sharing and Supplemental DRAFT Guidelines

The policy and supplemental docs are

[https://osp.od.nih.gov/wp-content/uploads/Draft NIH Policy Data Management and Sharing.pdf](https://osp.od.nih.gov/wp-content/uploads/Draft%20NIH%20Policy%20Data%20Management%20and%20Sharing.pdf)

[https://osp.od.nih.gov/wp-content/uploads/DRAFT Supplemental Guidance Allowable Costs.pdf](https://osp.od.nih.gov/wp-content/uploads/DRAFT%20Supplemental%20Guidance%20Allowable%20Costs.pdf)

[https://osp.od.nih.gov/wp-content/uploads/Supplemental DRAFT Guidance Elements NIH Data Management and Sharing Plan.pdf](https://osp.od.nih.gov/wp-content/uploads/Supplemental%20DRAFT%20Guidance%20Elements%20NIH%20Data%20Management%20and%20Sharing%20Plan.pdf)

Comments must be uploaded by Jan 10, 2020 using the portal at

<https://osp.od.nih.gov/draft-data-sharing-and-management/>

Chair: Sharon Broude Geva, University of Michigan • **Vice Chair:** Neil Bright, Georgia Institute of Technology
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Director: Lisa Arafune

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CASC Response

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Section I Purpose

CASC endorses the purpose of the proposed policy. Standards are important to reach the next level of data driven science. This policy helps challenges within the NIH mission. While standards are crucial, it is recognized elsewhere in the Policy that it must strike a balance of enforcement to foster standards with flexibility to deal with innovation that is in the very nature of research. In our view this Policy successfully hits such a balance. There is a clear and helpful statement that the Plan may be amended during the period of funded research. This addresses the fact that research projects by their very nature cannot be fully planned out. The supplemental guidance is good and enables the research community to develop and reach standards without creating an inflexible framework.

Section II Definitions

The definitions provide adequate clarity of the terms used in the Policy, without becoming overly detailed and technical.

Section III Scope

The statement of scope is clear and unambiguous. As addressed elsewhere in the Policy, it is possible to provide details of the Data Management and Sharing plan just-in-time so that the burden of preparing the plan is minimal and can be postponed until after it is known that funding of the proposed effort is highly likely.

Section IV Effective Dates(s)

The different cases to consider when the Policy will take effect are outlined with adequate precision to cover the existing NIH funding mechanisms and processes.

Section V Requirements

The requirements of the Policy are clear and simple, while still allowing for the required flexibility needed in research as accomplished by stipulating compliance with the NIH ICO, which may include some negotiation, and by providing supplemental guidance on allowable cost.

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Section VI Data Management and Sharing Plans

The Policy recognizes the need for a data management and sharing plan as a requirement but allows for exceptions in both what data and when the sharing is to occur. This is an important consideration in the context of research, whereby the very nature of the activity, not everything can be predicted. The explicit listing of Plan Elements and Plan Assessment is crucial to make the Policy clear so that compliance is possible without placing undue burden on the researchers.

Section VII Compliance and Enforcement

The Policy describes the process for reaching compliance. It also recognizes that providing data management and sharing services after the funding or support period may place a burden on the institution where the research was carried out by providing the possibility to include some of the cost in the project budget as described in supplemental guidance.

Supplemental DRAFT Guidance: Allowable Costs for Data Management and Sharing

The guidance on allowable cost provides valuable advice on planning of and budgeting for the sharing process and associated support activities. We urge that in practice, as implementation of this policy evolves, the data management and sharing costs are regarded as important components of the budget, and that proposers and reviewers all support budgeting reasonable costs for data management and sharing.

Supplemental DRAFT Guidance: Elements of an NIH Data Management and Sharing Plan (Plan)

By providing the details on data elements and related tools, standards, data preservation and access timelines, data sharing agreements and licenses, and accountable person(s) in a supplemental guidance document instead of in the body of the Policy, the Policy retains the necessary flexibility to adapt without undue burden to special cases that may, and will, arise in the context of research activities.

Other Considerations Relevant to the DRAFT Policy Proposal

The CASC response was prepared by a committee chaired by Erik Deumens, University of Florida.

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