

Supplemental DRAFT Guidance: Allowable Costs for Data Management and Sharing

NIH recognizes that making data accessible and reusable for other users, while integral to the research process, may require costs above and beyond the routine costs of conducting research. To assist individuals and entities who may be subject to a future NIH Policy for

Data Management and Sharing, NIH is proposing supplemental DRAFT guidance regarding potential categories of allowable NIH costs associated with data management and sharing for public comment. NIH is proposing that reasonable, allowable costs may be included in NIH budget requests when associated with:

1. **Curating data and developing supporting documentation**, include formatting data according to accepted community standards; de-identifying data; attaching metadata to foster discoverability, interpretation, and reuse; and formatting data for transmission and storage at a selected repository for long-term preservation and access.
2. **Preserving and sharing data through established repositories**, such as data deposit fees and charges necessary for making data available and accessible. When proposing to use a repository that charges recurring fees, budgets may include costs that would be incurred for preserving and sharing data. If the Plan proposes use of multiple repositories, consider including costs associated with use of each proposed repository.
3. **Local data management considerations**, such as unique and specialized information infrastructure necessary to provide local management, preservation, and access to data, (e.g., before deposit into an established repository). Budget estimates should not include infrastructure costs typically included in institutional overhead (e.g., Facilities and Administrative costs), nor costs associated with the routine conduct of research. Costs associated with collecting or otherwise gaining access to research data (e.g., data access fees) are considered costs of doing research and should not be included in budgets.