



Overview

This guide serves as a comprehensive resource for faculty, staff, and administrators to navigate the NIH Data Management and Sharing Policy requirements, from initial proposal preparation to post-award compliance and plan revisions.

In accordance with the NIH Data Management and Sharing (DMS) Policy, researchers are expected to maximize the appropriate sharing of scientific data while acknowledging that certain ethical, legal, or technical factors may limit the scope of sharing.

To assist Principal Investigators (PIs) in determining their data-sharing strategy, the following matrix outlines the reasons NIH generally considers valid for limiting data sharing versus those that are typically not acceptable.

DMS Decision Matrix: Justifiable vs. Non-Justifiable Limitations

Justifiable Reasons for Limiting Sharing	Non-Justifiable Reasons to Limit Sharing
Informed consent specifically prohibits or limits the scope of data sharing or future use.	The size of the dataset is considered “too small”.
Privacy or safety of research participants would be compromised, and existing protections are insufficient to mitigate this risk.	Researchers anticipate that the data will not be widely used by the scientific community.
Disclosure is prohibited by explicit federal, state, local, or Tribal law, regulation, or policy.	Researchers believe there is no suitable repository available for their specific data type.
Existing or anticipated agreements with other parties (e.g., third-party data providers or industry partners) impose restrictions on sharing.	General administrative preference or lack of preparation for data management.

Policy Scope and Definitions

- **Applicability:** The policy applies to all NIH-funded or conducted research that generates scientific data, regardless of the funding amount.
- **Scientific Data Defined:** Data of sufficient quality to validate and replicate findings. It excludes preliminary analyses, lab notebooks, drafts, and physical specimens.
- **Exemptions:** Does not apply to activities that do not generate scientific data, such as Training (Ts), Fellowships (Fs), and Conference Grants (R13).



Developing and Submitting the DMS Plan

- **Core Elements:** Plans must address six areas: data type; related tools/software; standards; preservation/timelines; access/reuse considerations; and oversight.
- **Submission:** The plan is uploaded to the “Other Plans” (Section 11) part of the Research Plan.
- **Budgeting:** Investigators may request funding for personnel or fees related to data management, but funds must be spent during the grant award period.
- **University Support:** Contact Rutgers University Libraries for assistance with plan creation.

Resources and Links

- [DMPTool](#)
- [NIH DMS Plan Format Page](#)
- [NIH Sample DMS Plans](#)
- [Webinar I: Understanding the Policy](#)

Selecting A Data Repository

- **Selection Hierarchy:** NIH encourages field-specific repositories first, followed by generalist or institutional repositories.
- **Quality Characteristics:** Repositories should provide Persistent Identifiers (DOIs), ensure long-term sustainability, and support metadata standards.
- **Institutional Repository:** [Scholarly Open Access at Rutgers \(SOAR\)](#) is available for datasets under 5 GB.

Resources and Links

- [Registry of Research Data Repositories \(re3data.org\)](#)
- [NIH-supported Scientific Data Repositories](#)
- [FAIRSharing.org](#)
- [Dataverse](#)
- [Dryad](#)
- [Figshare](#)
- [Mendeley Data](#)
- [OSF](#)
- [Vivli](#)
- [Zenodo](#)



Monitoring, Compliance, and Revisions

- **Monitoring:** The Principal Investigator (PI) is responsible for ensuring faithful adherence. NIH monitors compliance annually via the Research Performance Progress Report (RPPR).
- **Revisions:** If scientific direction or repositories change, the PI must work through Research and Sponsored Programs (RSP) to submit a prior approval request via eRA Commons at least 30 days in advance,.
- **Human Subjects:** For projects involving human-derived data, the DMSP must be consistent with informed consent and IRB protocols.

Resources and Links

- [NIH Guidance - Sharing Data from Human Subjects](#)
- [eRA Commons Notice \(NOT-OD-24-175\) - PI Responsibility](#)
- [eRA Commons Notice \(NOT-OD-24-176\) - Plan Revisions](#)

Institutional Support and Tips

- **University Resources:** For assistance with creating your plan or selecting a repository, researchers are strongly encouraged to contact Rutgers University Libraries.
- **Plan Tools:** You may use the NIH DMS Plan Format Page or the DMPTool, which provides Rutgers-specific templates.
- **Budgeting:** Ensure any requested funds for management and sharing are scheduled to be spent during the grant award period.
- **Compliance:** Remember that once approved, this plan becomes a Term and Condition of the Award, and the Principal Investigator (PI) is responsible for ensuring faithful adherence.



Checklist: Core Elements of the DMS Plan

The NIH requires a two-page plan that must be uploaded to the “Other Plans” (Section 11) part of the Research Plan. Use this checklist to verify that all six required elements are addressed:

- Data Type:** Have you identified the specific scientific data that will be preserved and shared?
- Related Tools, Software, and/or Code:** Have you listed the tools or software needed to access or manipulate the data?
- Standards:** Have you specified the standards to be applied to the scientific data and associated metadata (e.g., data terminology or schemas)?
- Data Preservation, Access, and Timelines:**
 - Have you named the repository where the data will be archived?
 - Does the plan include the use of persistent unique identifiers (such as DOIs)?
 - Have you stated when the data will be made available and for how long?
- Access, Distribution, or Reuse Considerations:** Have you described any factors or limitations affecting data access, distribution, or reuse?
- Oversight of Data Management and Sharing:** Have you clearly identified who will be responsible for monitoring and managing plan compliance?



Checklist: Core Repository Quality Characteristics

When selecting a repository—whether field-specific, generalist, or institutional—ensure it aligns with these NIH-identified quality characteristics:

- Unique Persistent Identifiers:** Does the repository assign a citable identifier (e.g., DOI) for discovery and reporting?
- Long-Term Sustainability:** Is there a stable plan for managing data integrity and availability backed by stable funding?
- Metadata:** Does the repository require sufficient metadata to enable discovery, reuse, and citation?
- Curation and Quality Assurance:** Does the repository provide expertise to improve the accuracy of datasets and metadata?
- Free and Easy Access:** Is access broad and equitable, free of charge, and consistent with legal/ethical limits?
- Broad and Measured Reuse:** Are there clear terms for reuse and the ability to track attribution and citations?
- Clear Use Guidance:** Is there accompanying documentation describing the terms of access and use?
- Security and Confidentiality:**
 - Are there documented measures to prevent unauthorized access or modification?
 - For sensitive data, are there safeguards to ensure confidentiality and risk management?
- Common Format:** Is the data/metadata provided in widely used, non-proprietary formats?
- Provenance and Retention:**
 - Does the repository record the origin and chain of custody (provenance)?
 - Is there a documented data retention policy?