

10<sup>th</sup> ANNUAL  
SYMPOSIUM  
FOR  
RESEARCH  
ADMINISTRATORS

NOV 13, 2025



...be inspiRED

RED

Research. Education. Development.

# NIH DMS Plans

---

## From Policy into Practice

Jennifer Ramsey, SMPH

Christy Schulz, SMPH

Kim Nolet, School of Nursing

# Meet the Presenters



**Jennifer Ramsey, CRA**  
Research  
Administrator, SMPH  
Dept. of Medicine  
Office of Research  
Services

They joined the UW team in 2022 from the Florida State University, and she has 16 years of experience with lifecycle grants management at the college and department level. Currently, they work with the Division of Infectious Disease.



**Christy Schulz, MS**  
Assistant Dean for  
Research  
Administration,  
School of Medicine  
and Public Health

She oversees research and sponsored projects administration activities on behalf of SMPH. This involves coordination of monthly meetings for SMPH Research Administrators which includes 17 Clinical Departments, 10 Basic Science Departments, and 23 Institutes and Centers. She has been a research administrator for 24 years at UW.



**Kim Nolet, MS**  
Research  
Implementation  
Manager, School of  
Nursing

She designs and implements faculty, staff, and student education across research administration topics and coaches research teams on grants startup and management. She was a research program manager in aging research for 20 years before transitioning to the Nursing Research and Sponsored Programs office.

# Session Learning Objectives

Learn about:

- NIH Data Management and Sharing (DMS) Plan content, budgeting, and any related updates to the NIH DMS policy.
- Choosing a repository
- Updating a current/active DMS Plan
- RPPR reporting requirements and associated questions

Participants will leave more confident in advising or assisting their faculty and researchers with NIH DMS Plans.

# DMS Plan Policy Purpose

## NIH Data Management & Sharing (DMS) Policy

Effective January 25, 2023; revised September 23, 2024.

“To promote the sharing of scientific data which accelerates biomedical research discovery, in part, by enabling validation of research results, providing accessibility to high-value datasets, and promoting data reuse for future research studies.”

# Alphabet Soup

---

Data Management and  
Sharing Plan

IS NOT THE SAME as the

Data Safety and Monitoring  
Plan.



# When do we need a DMS Plan?

**Applies** to research that generates scientific data:

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

[Complete list of activity codes](#)

Does not apply to activities that do not generate scientific data:

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

# DMS Plan – Covered Data

Applies to all research, funded or conducted in whole or in part by NIH, that results in the generation of scientific data.

- ✓ **Includes:** data needed to validate and replicate research findings.
- ✗ **Excludes:** lab notebooks, preliminary analyses, completed case report forms, drafts of scientific papers, plans for future research, peer reviews, communications with colleagues or physical objects such as lab specimens. See [NOT-OD-21-013](#).

# Drafting a DMS Plan - Format

- Length – 2 pages or less unless using an NIH template.
- Should be updated during the course of the award/support period to reflect any changes in the management and sharing of scientific data.
- Do not include hypertext (e.g., hyperlinks and URLs) in the DMS Plan.
- FOAs or ICs may have specific expectations e.g. scientific data to share, relevant standards, repository selection. View a list of NIH Institute or Center data sharing policies.
- Samples that align with the elements of a DMS Plan.
- DMP Tool & guide

# Drafting a DMS - Data Specifics

Data types

Related tools,  
software & code

Data standards (if  
no consensus  
standards exist,  
say so)

Preservation,  
access and  
timelines

Access,  
distribution & reuse  
considerations

Compliance  
Oversight of DMS

Additional details can be found in [NOT-OD0-21-014](#)

# Requesting DMS Costs

---

- If it looks like a DMS related cost and quacks like a DMS related cost, **it should probably be included as a DMS cost...**
  - Ex. Data Scientist, Cloud storage, etc.
- No DMS costs requested? You still need to address it!



Data Management  
Duck reminds you  
to **SPELL IT OUT!**

*Data Management  
and Sharing Plan  
Costs.*

# Justifying DMS Costs

Include the following details (1/2 page allowance):

- Statement of the proposed activities that will incur costs.
- Summary of type and amount of scientific data to be preserved and shared.
- Name the established repository(ies) to be used
- General cost categories

**Ex. Data Management & Sharing Plan Costs** - We are request funds to cover costs related to data storage and sharing (\$3,000/year). As part of the proposed work, we will generate measurements from lab instrumentation as comma-separated values (CSV) files (~100GB/year), which will be stored in the university cloud computing system. The files will be curated by team members and shared via a [DataDryad.org](https://data.dryad.org/) at the time of publication and any remaining data not covered by publications will be shared at award closeout. We also request salary/fringe support as detailed in the Other Personnel section of the justification for the individuals responsible for the collection, curation and management of project data.

# Budgets: What Do Teams Regret?

- Insufficient staff time/roles budgeted for data cleaning, deidentification, metadata preparation and other tasks for data deposit. Very tight DMSP turnaround times by end of grant (or earlier publication)=intensive work
- Not including data curation fees by repository professionals (varies by repository)
- Not looking closely at selected repository requirements until end of grant-is "free" really "free"? Data size limits, etc.



# DMS Plan Assessment

- Program staff at the proposed NIH Institute or Center (IC) will assess DMS Plans.
- Applications selected for funding will only be funded if the DMS Plan is complete and acceptable.
- Peer reviewers will not be asked to comment on the DMS Plan nor factor it into the Overall Impact score

# True or False?

The DMS Plan is a  
set it and forget it document.



**False!**

# Pre-award DMS Plan Revisions

- Communicate with the Program Officer and/or Grants Management Specialist to resolve any issues that prevent approval/funding.
- Applicants must use the “Data Management and Sharing Plan (DMSP) Revision” section of the [Just in Time \(JIT\) Screen](#) in eRA Commons, to submit a revised DMS Plan.
  - SOs must no longer use the ‘Other File’ section in Just-in-Time to submit the revised DMS plan.
  - Refer to [NIH Grants Policy Statement Section 2.5.1 Just-in-Time Procedures](#) for additional guidance.

# Repositories: Where PIs Share Data

## When selecting, consider:

- Institute/Center requirements
- Established, high quality repositories
- Discipline specific vs. General
- UW-Madison recommendations
- Repository requirements (e.g., limits on data size, data types, no PHI)
- Desire for repository assistance to meet standards & requirements (curation services)

## Type of Access Repository Offers:

You need to be clear about this in the DMSP & justify if not fully open.

- Fully open access
- Repository member only access
- Restricted-use (person requesting data must state justification and provide contact information)

NOTE: Some repositories offer multiple types of access, each with differing costs to research teams.

*See RDS Website & Example Handout for Names of Common Repositories*

# Human Subjects Data Sharing

## JUSTIFIABLE LIMITATIONS

- Ethical, Legal or Technical reasons. E.g.:
  - Deidentification and Certificate of Confidentiality not enough to mitigate risks to participants (e.g., highly sensitive/stigmatizing topic, difficulties in deidentification).
  - Licensing agreements for research materials restricts
  - DUAs restrict
  - Impractical to digitize
- NIH respects and recognizes Tribal sovereignty and American Indian and Alaska Native (AI/AN) communities' data sharing concerns. NIH has proposed additional considerations when working with Tribes and AI/AN communities.

## EXCLUSIONS

Examples of reasons that would generally not be justifiable factors limiting scientific data sharing include:

- Data that are considered too small
- Data that will not be widely used
- Data are not thought to have a suitable repository
- "It just makes me uncomfortable."

**DMS Plans should list and explain limitations on sharing**

# De-identifying PHI & Other Data

- Address in DMSP under "Protections for privacy, rights and confidentiality of HS..."
- Don't assume all researchers are adept at this and know policies. Encourage checking of UW policies first (policy library, IRB), funder policies, and industry standards. E.g.:
  - UW-Madison De-identification of PHI policy UW-114
  - DHHS Guidance regarding de-identification of PHI
  - Consult with unit HIPAA Privacy Coordinator, IRB



**Note:** Check for UW authorized use of de-identification tools

# Examples: Not always clear

- Sensitive employment information from small group of workers in a state
- Interviews re: sensitive or stigmatizing subject with marginalized population
- PHI in data set, even with recoding and removal of PHI, limited ability to validate deidentification per institutional policy
- Machine generated metadata in photographic or video image files (e.g., MRI)

# What to do if PI can't share? How to explain in DMSP

Favorable to explain a reasonable alternative

- Share data themes?
- Level of aggregate data?
- Recoding?
- Controlled access repository
- Other?

# Non-Human Genomic Data Sharing

- Investigators may submit data to any repository.
- Data is expected to be shared as soon as possible, but no later than the time of publication, or end of the performance period, **whichever is first.**

## Genomic Summary Results:

- Investigators conducting research subject to the GDS Policy should indicate in their DMS Plan if a study should be designated as “sensitive” for the purposes of access to Genomic Summary Results (GSR) as described in NOT-OD-19-023.

# Human Genomic Data Sharing

- Data Submission and Release Expectations vary based on data description.
  - Submit within 3 months of data generation
  - Release up to 6 months after data submission
  - No later than the time of initial publication
- Institutional Certification: UW-Madison HRP-064 Process

# DMS Plans & RPPRs

For awards for which the NIH DMS Policy applies, RPPR asks:

- 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; and
- If out of Plan compliance, what corrective actions have or will be taken to comply with the approved Plan.



# True or False?

At RPPR, a PI should only respond to C.5c DMS section if there are changes to the Data Management and Sharing Plan.

**FALSE!**

# Post-award DMS Plan Revisions

Plans may require revision over the course of a project for a variety of reasons.

- New scientific direction
- Different data repository
- Changes to how data is managed or shared
- Timeline revision

## Revisions to DMSP:

- Needs to be reviewed and approved by the NIH Institute or Center
- Must be submitted 30 days in advance of the change.
- Submit in eRA Commons
  - If within 30 days of RPPR due date, use section C.5.c "Upload Revised DMSP"
  - If greater than 30 days of RPPR due date, use Prior Approval Module-"Prior Approval-DMS Request"
  - Must be submitted by institutional SO

# Support & Resources for DMSPs

## UW Research Data Services (RDS)

- DMP Tool
- [HS Guidance](#)
- Storage Finder
- Responsible Data Sharing Course
- Presentation

## UW IRB

- [Guidance on sharing HS data](#)
- Data sharing language is in consent template tool

## UW Policy Library

- PHI De-Identification

## UW Community of Practice

- [Signup Sheet](#)
- [Teams Channel](#)

## NIH

- <https://sharing.nih.gov/data-management-and-sharing-policy>



# Thank you!

Jennifer Ramsey, CRA

Research Administrator

[jlramsey@medicine.wisc.edu](mailto:jlramsey@medicine.wisc.edu)

Kim Nolet, MS

Research Implementation Manager

[kanolet@wisc.edu](mailto:kanolet@wisc.edu)

Christy Schulz, MS

Assist. Dean for Research  
Administration

[crschulz@wisc.edu](mailto:crschulz@wisc.edu)