Finance, Audit and Costing Policy

Co-Chairs:
Michelle Bulls, National Institutes of Health
Cindy Hope, Georgia Institute of Technology

FDP Meeting – January 2022
Agenda

• Welcome and Committee Leadership Update

• Data Management and Sharing
  • Thought Exchange
  • Brief Background
  • Association of Research Libraries (ARL) project, “Realities of Academic Data Sharing”
  • Working Group Charter
  • Call for Working Group Members

• Prior efforts/future working groups
Welcome and Committee Leadership Update

- **Federal Co-Chair**
  - Michelle Bulls, Director, Office of Policy for Extramural Research Administration (OPERA), NIH

- **University/Research Institution Co-Chair**
  - Jim Luther retired from Duke (still involved in FDP)
  - Cindy Hope, Interim VP for Research Administration, Georgia Tech
  - Christi Keene, Assistant Director, Post Award Support Services, The University of Chicago
Data Management and Sharing

- Melissa Korf, Director, Grants & Contracts, Harvard Medical School
  - FDP Research Compliance Committee Co-Chair
- What we have learned thus far
- Joint Data Stewardship and FAC Working Group
- Next steps
Ahead of the September 2021 meeting, FAC ran a faculty-focused ThoughtExchange (TE) to better understand, from the faculty perspective, the most important things that institutions or funding agencies could do to more effectively support **costing** aspects of the Data Management & Sharing Lifecycle to reduce burden and support research.

As FDP’s work in this space moves forward, we now seek the institutional perspective in this “live” TE to help us best target our efforts. As you participate in this portion of today’s session, please consider what FDP could do that would have the greatest impact for your institution in this space and share these with us in the below TE. Please also rank the thoughts shared by your colleagues; both the thoughts and star ratings are anonymous.

Link to ThoughtExchange:
## Cost Implications: Lifecycle Public Data Access Activities

<table>
<thead>
<tr>
<th>#</th>
<th>Activity</th>
<th>Timing</th>
<th>Sponsor Pay</th>
<th>Institution Pay</th>
<th>External Repository</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Lifecycle Public Data Access Activities</td>
<td><strong>Timing (Pre-Proposal submission, Life of award, Post-Closing)</strong></td>
<td>Sponsor Pay (Charged to award) as line item or via Service Center</td>
<td>Separate Award (different prd of performance) and/or Bud Line Item for Data Only</td>
<td>Service Center (likely subsidized by institution but charged to project)</td>
<td>Institution Pay (Admin Capped) Institution Pay (Uncapped: O&amp;M or Library) Institutionally Supported Repository</td>
</tr>
<tr>
<td>2</td>
<td>DMP Development</td>
<td>PRE - PROPOSAL</td>
<td>No</td>
<td>Yes</td>
<td>Yes</td>
<td>Publisher / Discipline / Sponsor / Professional Society / One Time (Fig Share)</td>
</tr>
<tr>
<td>3</td>
<td>Data Curation &amp; Metadata Curation (FAIR, Data dictionary, etc.)</td>
<td>LIFE (SOME PRE)</td>
<td>Some sponsors allow</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Data Ingest</td>
<td>LIFE</td>
<td>Hopefully</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>DMP Monitoring &amp; Compliance through life of award through closeout</td>
<td>LIFE</td>
<td>Hopefully</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>Data Storage (during life of project)</td>
<td>LIFE</td>
<td>Probably yes</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Data Storage (post-closeout for publication)</td>
<td>POST/LIFE</td>
<td>Probably no unless feds allow booking an estimate (see UG) or they provide a separate award with different period of performance</td>
<td>?</td>
<td>?</td>
<td>Contrary to open access principles</td>
</tr>
<tr>
<td>8</td>
<td>DMP Monitoring &amp; Compliance - post closeout</td>
<td>POST</td>
<td>Probably No</td>
<td>?</td>
<td>?</td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Data Storage (post-closeout for DMP Compliance)</td>
<td>POST</td>
<td>Probably no unless feds allow booking an estimate (see UG) or they provide a separate award with different period of performance</td>
<td>?</td>
<td>?</td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>Cold Data Storage (post-closeout / last resort)</td>
<td>POST</td>
<td>Probably no unless feds allow booking an estimate (see UG) or they provide a separate award with different period of performance</td>
<td>?</td>
<td>?</td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>Publication Fees (often based on size and duration of data)</td>
<td>POST</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>Data Security (PHI, HIPAA, Export Controls, FISMA, student data and IP)</td>
<td>PRE, LIFE &amp; POST</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
## Sept 2021 TE Results

### Top 3 Areas of Concern

<table>
<thead>
<tr>
<th>%</th>
<th>Answer (Multi-select)</th>
</tr>
</thead>
<tbody>
<tr>
<td>12%</td>
<td>Data Management Plan (DMP) Development</td>
</tr>
<tr>
<td>20%</td>
<td>Data Curation &amp; Metadata Curation (Data dictionary, etc.)</td>
</tr>
<tr>
<td>3%</td>
<td>Data Ingest and Loading</td>
</tr>
<tr>
<td>38%</td>
<td>DMP Monitoring &amp; Compliance - During Life of Award</td>
</tr>
<tr>
<td>46%</td>
<td><strong>DMP Monitoring &amp; Compliance - At Closeout &amp; Post-Closeout</strong></td>
</tr>
<tr>
<td>33%</td>
<td>Data Storage - During Life of Award</td>
</tr>
<tr>
<td>68%</td>
<td><strong>Data Storage - At Closeout &amp; Post-Closeout</strong></td>
</tr>
<tr>
<td>9%</td>
<td>Data Processing</td>
</tr>
<tr>
<td>11%</td>
<td>Publication Fees</td>
</tr>
<tr>
<td>53%</td>
<td>Data Security (PHI, HIPAA, Export Controls, FISMA, student data and IP)</td>
</tr>
</tbody>
</table>

### What data sets do you currently use, develop, or acquire?

<table>
<thead>
<tr>
<th>%</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>40%</td>
<td>Institutionally provided</td>
</tr>
<tr>
<td>26%</td>
<td>Sponsor provided</td>
</tr>
<tr>
<td>38%</td>
<td><strong>Data acquired through purchase</strong></td>
</tr>
<tr>
<td>44%</td>
<td><strong>Data acquired through your activities</strong></td>
</tr>
<tr>
<td>32%</td>
<td>Data sharing (with consortium or cooperative agreement)</td>
</tr>
<tr>
<td>6%</td>
<td>Other</td>
</tr>
<tr>
<td>22%</td>
<td>Not applicable</td>
</tr>
</tbody>
</table>
Sept 2021 TE Results

- agencies
- costs
- funding
- requirements
- institution
- budgets
- project
- maintain
- provide
- security
- cloud
- investigators
- consistency
- estimating
- readily
- university
- research
- management
- fa
- set
- dmp
- data
- sponsor
- direct
- storage
- afford
- time
- help
- admin
- available
- issues
- pay
- clear
- model
- staff
- understand
- guidance
- purchase
• NASEM Report on Life-Cycle Decisions for Biomedical Data: The Challenge of Forecasting Costs.
  • https://www.nationalacademies.org/our-work/forecasting-costs-for-preserving-archiving-and-promoting-access-to-biomedical-data
• Accelerating Public Access to Research Data
  • https://www.aplu.org/projects-and-initiatives/research-science-and-technology/public-access/

• Guide to Accelerate Public Access to Research Data
  • https://www.aplu.org/library/guide-to-accelerate-access-to-public-data/file
• NIST Research Data Framework (RDaF)

• Preliminary RDaF Publication
Federal funding agencies have implemented various policies requiring appropriate management and sharing of research data, providing for openness that is necessary to “accelerate scientific breakthroughs and innovation, promote entrepreneurship, and enhance economic growth and job creation”. (https://obamawhitehouse.archives.gov/sites/default/files/microsites/ostp/ostp_public_access_memo_2013.pdf) NSF, for example, requires the inclusion of a Data Management Plan with each proposal, describing plans for compliance with NSF requirements to share “primary data, samples, physical collections and other supporting materials created or gathered in the course of work under NSF grants.”(https://www.nsf.gov/bfa/dias/policy/dmp.jsp) More recently, NIH issued its new Policy on Data Management and Sharing, effective 1/25/2023. This policy includes prescriptive requirements that research institutions are determining how to manage, including how to allocate the cost of compliance. While NIH “recognizes that making data accessible and reusable for other users may incur costs” and “outlines categories of allowable NIH costs associated with data management and sharing” (https://grants.nih.gov/grants/guide/notice-files/NOT-OD-21-015.html), federal regulations and research institution policies and procedures for cost allocation may limit the potential for reimbursement of the cost of compliance.
This Working Group will focus on and act as FDP’s key point of contact for this evolving topic; how it is affecting the FDP member organizations; activities that FDP could undertake to identify obstacles to effective data management and sharing, including reimbursement of allocable costs; assist in keeping members updated as well as provide for a discussion with federal representatives.
- **Call for Volunteers**
  - From the Finance, Audit and Costing Committee we seek individuals with strong financial, *particularly costing*, experience
  - Contact Cindy and/or Christi
    - cindy.hope@osp.gatech.edu
    - ckeene@uchicago.edu
- **Joint WG with Data Stewardship Subcommittee**
What are your thoughts?

• Initial review of ThoughtExchange results
Some Other Prior/Future Efforts

• FCTR Elimination
• FFR Migration to PMS
• PMS Deobligations/Small Credits
• Direct Ledger Technology
• LOC
• Training Grants
• See prior meeting summaries, videos and slides
• New topics?

Contact Cindy and/or Christi and/or Workgroup Leader
Resources and Contact Info

• Previous Meeting Presentations
  • [http://thefdp.org/default/meetings/previous-meetings/](http://thefdp.org/default/meetings/previous-meetings/)

• Finance, Audit and Costing

• Cindy Hope
  • cindy.hope@osp.gatech.edu

• Christi Keene
  • ckeene@uchicago.edu
Questions & Discussion

• All feedback, comments, questions -