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

Live Thought Exchange

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

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

Draft In-Process

Sept 2021 TE Results

%	👤	Answer (Multi-select)
12%	(7)	Data Management Plan (DMP) Development
20%	(11)	Data Curation & Metadata Curation (Data dictionary, etc.)
3%	(2)	Data Ingest and Loading
38%	(21)	DMP Monitoring & Compliance - During Life of Award
46%	(25)	DMP Monitoring & Compliance - At Closeout & Post-Closeout
33%	(18)	Data Storage - During Life of Award
68%	(37)	Data Storage - At Closeout & Post-Closeout
9%	(5)	Data Processing
11%	(6)	Publication Fees
53%	(29)	Data Security (PHI, HIPAA, Export Controls, FISMA, student data and IP)

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

%	👤	
40%	(20)	Institutionally provided
26%	(13)	Sponsor provided
38%	(19)	Data acquired through purchase
44%	(22)	Data acquired through your activities
32%	(16)	Data sharing (with consortium or cooperative agreement)
6%	(3)	Other
22%	(11)	Not applicable

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CONSENSUS STUDY REPORT

LIFE-CYCLE DECISIONS FOR BIOMEDICAL DATA

The Challenge of Forecasting Costs
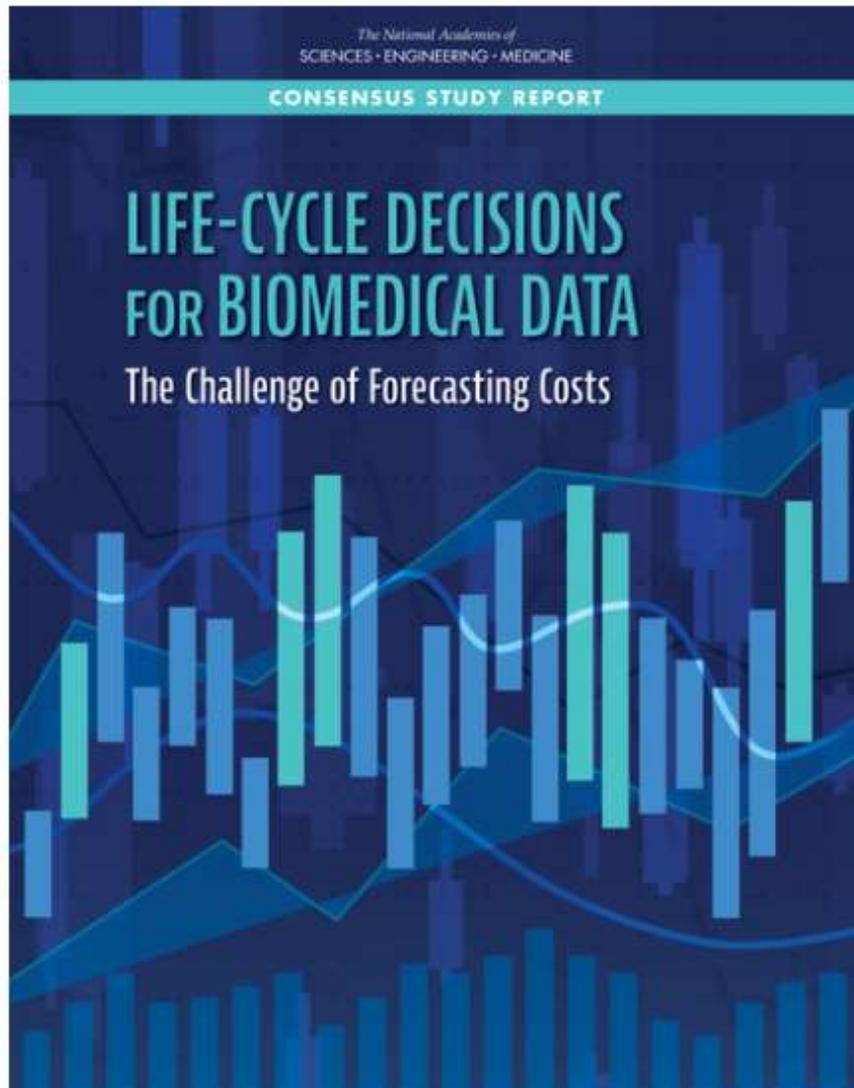
- NASEM Report on Life-Cycle Decisions for Biomedical Data: The Challenge of Forecasting Costs.
  - https://www.nationalacademies.org/our-work/forecasting-costs-for-preserving-archiving-and-promoting-access-to-biomedical-data

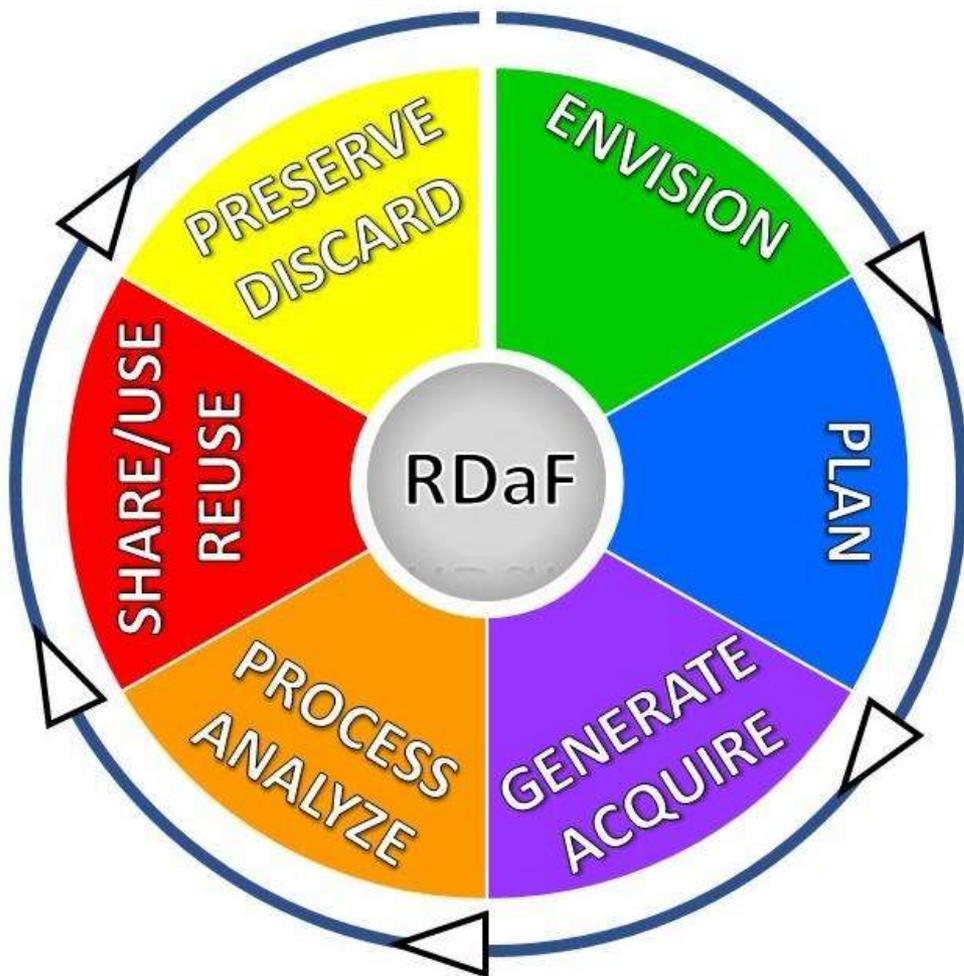# Guide to Accelerate Public Access to Research Data

- 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

Association of American Universities

ASSOCIATION OF PUBLIC & LAND-GRANT UNIVERSITIES

- NIST Research Data Framework (RDaF)
  - https://www.nist.gov/programs-projects/research-data-framework-rdaf
- Preliminary RDaF Publication
  - https://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.1500-18.pdf

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 proscriptive 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.

Data Management and Sharing Working Group

- 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/
- Finance, Audit and Costing
  - http://thefdp.org/default/committees/financial-costing-and-audit-policy/
- Cindy Hope
  - cindy.hope@osp.gatech.edu
- Christi Keene
  - ckeene@uchicago.edu

Questions & Discussion

- All feedback, comments, questions -