

From: research.listserv@mssm.edu <research.listserv@mssm.edu>

Sent: Tuesday, October 24, 2023 7:02 AM

**Subject: [GCO] Prior Approval for Changes to NIH Data Management and Sharing Plan; Updated Guidance on Prior Approval Requirements**



## Research Alert

Dear Research Community,

NIH released a notice Sept 2023 entitled "Prior Approval Requests for Revisions to an Approved Data Management and Sharing (DMS) Plan Must be Submitted Using the Prior Approval Module ([NOT-OD-23-185](#))."

In the notice the NIH reminds "the extramural research community that any changes to an approved [Data Management and Sharing Plan \(DMS Plan\)](#) (for funded awards subject to the [Final NIH Policy for Data Management and Sharing \(DMS\) Policy](#)) requires the recipient to submit a timely formal prior approval request to the funding NIH Institute, Center, or Office (ICO)."

The prior approval request must be submitted by the Authorized Organization Representative (AOR) at least 30 days in advance of the requested change. The currently approved DMS Plan remains in effect for the award until the request is approved by the NIH.

The NIH also informs the research community that recipients must submit these requests through the Prior Approval Module in eRA Commons.

GCO's [Prior Approval Requirements and Rebudgeting Policy](#) has been updated with this information. We've also restructured and added instructions on required documentation when prior approval requests are submitted via the eRA Commons Prior Approval module.

If you have any questions, please feel free to contact the [GCO](#).

Sincerely,

Allison Gottlieb

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