

Background talks with the European Commission on RDM requirements in Horizon Europe, December, 6th 2021

Das Gespräch fand am 6.12.2021 virtuell statt. An dem Gespräch nahmen als Vertreter der European Commission Dr. Carlos Casorrán (EC), Dr. Konstantinos Repanas (EC), Dr. Victoria Tsoukala (EC), Christian Cuciniello (EC) sowie die Vertreterin der KoWI (Kooperationsstelle EU der Wissenschaftsorganisationen) Mareike Schmitt teil. Wir danken allen Beteiligten für das Gespräch und die Möglichkeit, die Ergebnisse im Rahmen dieses Protokolls zu veröffentlichen.

Formal requirements and support

Who is involved in the process of defining the RDM requirements for funding proposals? How are final decisions made and by whom?

RDM requirements and the Open Science Policy are defined by the “Open Science Unit” of the Directorate General for Research and Innovation at the European Commission. This group engages with a range of stakeholders for input. The focus is, however, on community aggregators like RDA or Science Europe. There is no systematic direct outreaching to researchers, although feedback from beneficiaries of the funding programmes has been received.

The nature of the processes in the European Commission impose very specific time frames on the work of the unit. Policies have to be ready in advance of a given Framework Program. Requirements can be tweaked or policies can be updated to some extent after a program has started, but major updates only come with a new framework program. The model grant agreement does not change much over the course of a program, but templates can be updated or comments can be added.

[FAIR](#) was thought to be an aggregating concept to address in an efficient and easy way a broad range of research communities with many researchers who are not familiar with research data management. The Open Science Unit hopes to receive feedback from communities soon. DMPs are intended to lead communities towards fulfilling the requirements asked for in the templates.

Official information on RDM requirements in Horizon Europe is currently scattered over various guides and forms and even across different chapters within a document, making it difficult for applicants to keep track of all regulations. Are there any plans to subsume them in some kind of easy-to-grasp checklist or online manual? The current HE online manual does not seem to contain any information related to research data.

There are no current plans to centralise all RDM requirements for Horizon Europe in a single place, nor is it possible to subsume all documents into a single document. There is a small number of relevant documents, each serving a specific purpose:

1. [Model grant agreement](#): legal obligations
2. [Annotated grant agreement](#): clarifies and provides additional remarks
3. [Program guide](#): best practices and resources – most important document for researchers, the closest thing to an easy-to-grasp checklist
4. [Proposal template](#): Proposals must include a one-page statement on RDM at the proposal stage that is subject to evaluation

5. [DMP template](#): a non-mandatory template – the structure is supported by the EC, but it should only be used if deemed fit by the researchers

Question: In H2020 there was a single document - why no more in HE?

Unfortunately, the online guide became what is now the [corporate online guide](#), which means it provides links to important resources for each of the European Commission's many framework programmes, one of which is Horizon Europe. This was not the decision of the Directorate-General for Research and Innovation or up to DG-RTD but of central European Commission services.

The EU provides a helpdesk for IPR issues. Are there any plans to establish an RDM helpdesk, too?

There are currently no plans to implement any helpdesks for RDM. However, applicants are always free to ask any questions to the overseeing project officer.

However, in the medium run, the European Open Science Cloud will include national knowledge hubs on data management and FAIR from 2022 on. This network of hubs can assist in data management and thus serve as a distributed helpdesk. The European Open Science Cloud will mainstream data management practices across communities, including underrepresented communities, and the federated ecosystem will act as a distributed help desk, allowing researchers to develop a better understanding of best practices related to RDM.

Some applicants criticize the official DMP template as partly confusing, since sometimes the same information seems to be expected in several chapters. Are there any plans to systematically gather and evaluate such feedback and to improve the template accordingly?

The current DMP template is an evolution from H2020, not a revolution. The FAIR principles are the main thread. The template builds on state of the art input, e.g. works by Science Europe, FAIRsFAIR, RDA working groups (FAIR DATA maturity model working group, among others), and tries to take the best from all sources. However, the templates are not intended to be prescriptive. They rather serve as a useful, but optional, tool. Researchers are free to design individual templates as they see fit. The Open Science unit appreciates comments and suggestions, but cannot guarantee that the template will be changed based on such feedback. It is likely, however, that there will be a revision or improvement of the template, midway Horizon Europe.

Do you evaluate the effectiveness of these formal requirements and the feedback on their formulation and communication? Are there plans for further developing and improving these formal requirements?

The effectiveness of the RDM policy is assessed in several moments: In a midterm evaluation and after the end of the framework programme. It is possible that a study similar to [Monitoring Open Access Policy](#) (MOAP) for Horizon 2020 will be carried out at the end of the framework period.

[Review and evaluation processes](#)

Which are the criteria for reviewers when evaluating RDM chapters and DMP? Would it be possible to publish such guides or checklists for the sake of transparency? It would help applicants to better understand the funder's expectations.

Reviewers evaluate RDM-statements in the proposal based on briefings provided by the Open Science Unit, rooted in the [program guide for Horizon Europe](#). DMPs are only expected at the start of the project (within the first 6 months), but are not subject to evaluation. DMPs are rather intended as useful tools to assess data management needs for researchers. At proposal stage, only a one-page statement on research

data management is required, which is subject to evaluation (under the methodology description, which is part of the Excellence criterion). Specific items that should be addressed by proposers are listed in the [RIA proposal template](#) under the relevant section.

Data management plans are considered essential tools for beneficiaries to think ahead and plan their RDM needs since the start of their research activity. Better foresight will ensure that research data management practices are adhered to, in no small part, to the benefit of researchers themselves.

We once interviewed a reviewer for H2020 DMPs. Are such special DMP reviewers still regularly deployed or was that a limited measure related to the H2020 open data pilot? If they are still deployed, how much does their vote influence the overall evaluation of a project?

Evaluation of proposals is done by expert evaluators, not by DMP-reviewers. Reviewing of DMP only becomes relevant once the program is running. Reviewers support the project officers to track project progress, but they have no impact on funding decisions. Evaluators, Reviewers and project officers are regularly briefed on open science requirements based on the program guide.

When a project is evaluated, is there a regular process in place to check whether RDM measures described in a DMP were actually put into practice? If so, what happens if this is not the case?

Generally, the model grant agreement states the legal obligations projects have to comply with. The beneficiaries have to self-report. Compliance with RDM requirements is considered by project officers and reviewers. If a project neglects compliance, officers can take action on different levels of escalation, ranging from warnings up to termination of grants.

The DMPs themselves are not evaluated, though. The Open Science unit wants to move away from the perception that DMPs are administrative burdens and something to be evaluated towards the vision that DMPs are a useful tool. Feedback from the projects suggests that this view is taken up by researchers. However, project officers do check whether what has been promised on RDM in the application is being delivered, always through the information received from the DMP deliverables. Additionally, if DMP deliverables are missing elements, e.g. to address whether a dataset is open or closed, that can be a topic of discussion between the supervising officers and a project.

Applying consortia need to demonstrate expertise on data management. The expertise may not only lie with the researchers but also with data stewards. The operative word is “demonstrate”, but there are no prescriptions as to how expertise is demonstrated.

We are not yet at a stage where a large number of reviewers is competent to review RDM, but we will see reviewers and project officers with an increasing awareness of and expertise in RDM. As we move forward in the framework, DMPs as living documents may also be evaluated. RDM is a very prominent part of the EC's Open Science policy as we promote „responsible data management in line with the FAIR principles“.

[Practical issues](#)

Do you consider information on RDM measures in form of continuous text the most suitable format? If not, how do you intend to receive such information in a more structured and machine-readable format in the future?

In the future, we expect to gradually move away from text DMP towards machine actionable DMP.

Will the EU favour a certain tool for the creation of DMP (e.g. ARGOS) in the future to enhance uniformity/standardisation?

The Open Science Unit encourages the use of tools but does not want to favour one tool over another – not least because tools are sometimes discipline-specific. Communities are already moving towards standardization of requirements, so there seems to be no need to interfere. References to some tools like DS-Wizard or ARGOS are provided.

Many project consortia consist of partners at different locations, each with its own infrastructure, or they comprise researchers from different disciplines working with different kinds of data. Does it make sense to subsume RDM measures for all partners into a single DMP? In these cases, would it be an option to distinguish between a central DMP with general project guidelines (= an internal RDM policy) and more detailed sub-DMPs for each partner?

A project-level DMP is a formal requirement of funding grants under Horizon Europe insofar as it is a deliverable expected by Month 6 of the funding period in case of projects that generate or re-use research data. However, if a project concludes that RDM within the project would benefit from an increased level of granularity, for example by partner-level DMPs, then it should pursue this approach. The same holds true for any other action project partners see fit to mainstream and enhance RDM within their project, by the way.

Researchers are required to publish research data in “trusted repositories”. Do these repositories need a certain certificate to proof that they qualify?

The responsibility to demonstrate trustworthiness lies with the beneficiaries. A number of criteria are mentioned in the guidance. Data management personnel should address these criteria in the DMP. As EOSC infrastructure grows, EOSC ecosystem repositories will likely be automatically considered trusted.

Funds and budgets

Many researchers hesitate to apply for RDM funds if they have to reduce resources for other research activities in turn. Would the EU consider excluding the RDM budget from the overall project budget limit? The overall limit could be lowered, in turn, to reserve sufficient funds for RDM measures.

Such actions are not expected. RDM funds are eligible under Horizon Europe. As a general guidance, around 5% of funds should be spent on RDM. This is, however, a rule of thumb. Projects that are more data intensive could allocate a larger percentage of their grants to RDM, based on their needs. The responsibility to argue the need for a larger allocation of the requested funds rests with the project's data management staff, but these are internal discussions between members of consortia that should take place when preparing project proposals. Evaluators will then evaluate accordingly.

Are there any statistics about the type and the amount of funds for RDM measures that had been applied for and that were granted (or not granted) during the course of the last decade?

There are no such statistics. RDM costs have been fully eligible under Horizon 2020 and will continue to be so under Horizon Europe. These statistics could, however, appear in the context of the assessment of the policy.

Which kinds of RDM costs exactly are eligible for funding? Which are definitely not? Which contributions are expected from the applying research institutions (funds, infrastructure, personnel etc.)?

A non-exclusive list of fundable open science and data management activities is provided in the [programme guide](#). Related services and infrastructures may be provided by the project, by the

participating research institutions or by external providers. Generally, reasonable and necessary RDM costs will always be eligible.

There are no generally non-eligible RDM costs, but of course, they have to be adequate. If, for example, a proposal indicates the need to build an institutional repository, that would not be covered. Storage, on the other hand, for the needs of a project for a certain time, can be eligible.

If researcher apply for funds used to pay for commercial RDM-related services (e.g. data curation or long-term preservation), do they need to present several offers and to always choose the cheapest provider?

The question is too specific to give a universal answer. At a general level, the concept of value for money applies. Operational colleagues in the EC could provide additional information.

[Further collaboration and communication](#)

We (RDM support personnel at German research institutions) are happy to provide further feedback on RDM in HE and to share our counselling experiences with the EC, if desired. Would you be interested in establishing a regular discussion and feedback meeting with our working group? If yes, in which form (frequency, duration, participants etc.)?

We are very interested in engaging with all communities. However, bandwidth is an issue, and the Open Science Unit tries not to replicate structures. It is suggested to form stronger ties with RDA/national funders as aggregators. Although regular meetings between UAG DMP and Open Science Unit do not seem feasible, communication channels should be kept open. Meetings on a case by case basis should be possible. Written feedback is also welcome.

We plan to establish a general public panel meeting on RDM between funders, research support staff and researchers. It should take place about once a year, preferably in connection with a larger conference (e.g. the annual meetings of RDA-DE or DINI). Would the EC be interested to participate with one or several representatives?

The Open Science Unit does not oppose discussing with other funders. However, as with regular meetings, time is an issue.