



Research Data Ownership and Retention	
Responsible Official: Vice Provost for Research and Sponsored Programs	Responsible Office: Research and Sponsored Programs

### Policy Purpose

The purpose of this policy is to ensure that research data is retained and available for review by the University, sponsors, and state and federal agencies.

### Policy Statement

The University claims ownership of research data for projects conducted at the University, under the auspices of the University or using University resources by faculty, staff, students, post-doctoral fellows, scholars, and visiting scientists in the course of their scholarly activities. Principal Investigators and the University have rights and responsibilities for retaining research data.

- I. The University will:
  - A. Comply with all federal and state regulations governing data retention and access.
  - B. Comply with the terms of all sponsored project grants and contracts.
  - C. Maintain confidentiality of research data, where appropriate (e.g., HIPAA data, etc.)
- II. The Principal Investigator (PI), as the custodian of the data, has primary responsibility for:
  - A. Overseeing the conduct of research/scholarly activity, both extramurally funded and other
  - B. Retention of all data and records
  - C. Providing access to the University, sponsors, and regulatory agencies
  - D. Sharing Data as required by the sponsor
- III. Data Retention
  - A. Research data must be retained a minimum of three years after the submission of all required reports (i.e., financial, special reports), or for the period designated by regulation in special circumstances (i.e., research misconduct investigations, export control, audit, etc.), or after students have completed their thesis or dissertation, whichever is longer.
  - B. Research data must be retained as long as required to protect any intellectual property that was produced as a result of the research.
  - C. Research data involving human subjects must be maintained and/or destroyed as required by the University's Human Research Subjects Protection Program according to federal regulations (e.g. OHRP and FDA).
  - D. When students were involved in the research/scholarly activity, research data must

be retained until the student's degree is awarded, the student leaves the University, or the research is published.

- E. Research data must be retained in the department or unit where it was generated (in the case of multiple departments, data should be retained by the department in which the PI of the study resides).
- F. Upon conclusion of the period of retention, the PI may destroy the data in accordance with applicable federal regulations or sponsor requirements.

#### IV. Transfer of Responsibility When a Researcher Leaves the University

If a staff member, student, post-doctoral fellow, scholar, or visiting scientist other than the PI, departs the University, she/he may retain copies of all research data at the discretion of the PI, but the original data must remain with the PI. The PI's decision can be appealed to the Vice Provost for Research and Sponsored Programs. If the PI leaves the University, the original data may be transferred to the new institution on approval by the University's Vice Provost for Research and Sponsored Programs and through a formal agreement that the new institution accepts responsibility for retaining the data, maintaining appropriate confidentiality, and providing University access in order to fulfill its responsibilities under the terms of award, including allegations of research misconduct.

Authority: Policies from federal sponsors including the [National Institutes of Health](#) and [National Science Foundation](#) regarding data management, retention and sharing, and as directed in the Office of Science Technology Policy Memorandum, [Increasing Access to the Results of Federally Funded Scientific Research \(February 22, 2013\)](#).

### Definitions

Research data	All recorded information in any form (e.g. laboratory notebooks; electronic data collected using laboratory instrumentation; computer software; videos; qualitative data (interview transcripts and coding); survey data; memoranda; research resources, including synthetic compounds, cell lines, microorganisms (bacteria and viruses) cloned nucleic acids, DNA sequences, plants and animals (e.g. knockout mice)). For clinical studies, research data includes case histories, clinical protocols, case report forms, and supporting documentation.
Principal Investigator (PI)	Faculty or faculty sponsor/mentor with the primary responsibility of retaining research data and following the data management requirements of the University and the sponsor.
Research/Scholarly Activity	Systematic investigation with the purpose of developing or contributing to knowledge.

### Policy History

### Procedure (s)

Procedure History

Effective Date: TBD

Revision Date:

Related Form(s)

Scope and Applicability

	Governance	
X	Academic	
X	Students	
	Employment	
	Information Technology	
	Environmental Health and Safety	
	Business and Finance	
	Facilities and Operations	
	Communications & Marketing	
	Advancement	