University of Pittsburgh
Research Data Management
Interim Policy RI 14

Implementing Executive:	Senior Vice Chancellor for Research
Responsible Unit:	Office of Research Protections
Category:	Research & Innovation Policies
Effective Date:	October 16, 2023

I. Purpose

The University of Pittsburgh ("University") has both rights and responsibilities toward data generated by research at the University, including ensuring that the data are secured and maintained in accordance with applicable laws and regulations. The University is also responsible for validating the integrity of data collected by University Members at the request of funding agencies, publishers, governmental agencies, and others. These obligations necessitate the development of institutional policies on data access, retention, and transfer to other entities in accordance with funding agency and other requirements.

II. Scope

This Policy applies to all University Members (as defined below) and their Research Records (as defined below) that are generated at the University, under the purview of the University, or produced with University resources. Information related to teaching activities is generally excluded under this Policy, although other University policies may be applicable to this information.

III. Definitions

A. Data Management Plan ("DMP"): A description of the data expected to be acquired or generated during the course of a research project, how those data will be managed, analyzed, and stored, and the mechanisms used at the end of the project to share and preserve the data.

B. Data Sharing: The act of making Research Data available for use by others (e.g., the larger research community, institutions, the public), for example, via an established repository or through contractual agreements.

C. Incidental Use: Limited personal use of University equipment or services that the University is already providing and the University Member's use of such equipment or services will not result in any additional expense to the University, or the use will result in only normal wear and tear, and uses only small amounts of power and expendable supplies, and such use complies with existing contractual obligations.

D. Research Data: The recorded, retrievable information and/or forms of evidence collected, generated, or created in the pursuit of new knowledge that are necessary to validate Research Outputs. Research Data must be sufficient to facilitate: 1) reconstruction of experimental methods or other analytical practices that underpin scholarly interpretations and arguments and, where appropriate 2) accurately interpret Research Outputs, regardless of form or recorded medium. Research Data comprises a portion of the Research Record. Research Data may also be subject to sponsor, funder, or publisher requirements and standards.

E. Research Outputs: The results, findings, and reports of research inquiries that contribute to any body of knowledge. The research community may seek to replicate or validate Research Outputs through the review and analysis of Research Records including Research Data. The form of Research Outputs may vary according to scholarly disciplines, but could include computer code, algorithms, curated or analyzed sets of data, videos, films, patents, archives, and publications. Research Outputs comprise a portion of the Research Record.

F. Research Record (or "Record(s)"): Any data, documents, computer files, or physical materials that document the process and outcome of scientific or another form of scholarly inquiry or other Research Output. Research Records can be written or non-written, electronic, or hard copy. Regardless of the form in which Research Records are maintained, they should be able to meet reasonable expectations to provide evidence or information regarding the proposed, performed, reviewed, and/or reported research. Examples of Research Records include, but are not limited to, submitted grant or contract applications, whether funded or unfunded; grant or contract progress and other reports; systematic collections of primary sources, whether textual, auditory, or visual; notes taken from research in physical or digital archives; laboratory notebooks (physical and electronic); ethnographic field notebooks; interviews and survey data; podcasts; videos; photographs; films; slides and exhibits; biologic materials; computer files and printouts; manuscripts and publications; equipment use logs; laboratory procurement records; animal facility records; human and animal subject protocols; consent forms; medical charts; participant research files; abstracts, theses, oral presentations, and internal reports. Research Data and Research Outputs are components of the Research Record.

G. Responsible Individual: The University Member with ultimate responsibility for managing a research project. Typically, the Responsible Individual is the principal investigator or a faculty member with responsibility for oversight of a project.

H. Retention Period: The length of time Research Records must be retained following the dissemination of knowledge from research, the completion of a study, or the conclusion of a sponsored research agreement.

I. Sponsored Activities: Externally-funded activities in which a formal written agreement (i.e., grant, contract, or cooperative agreement) is entered into by the University and by a sponsor, in which there is a specified statement of work, with a related, reciprocal transfer of something of value.

J. Student (or "Students(s)"): All individuals taking courses at the University, pursuing undergraduate, graduate, or professional studies, both degree and non-degree seeking, as well as individuals enrolled in non-credit courses and programs.

K. University Member: All full-time and part-time faculty; staff; Students; academic visitors; volunteers; postdocs; fellows; trainees; and interns at the University.

IV. Policy

A. Research Record Ownership

Unless superseded by specific terms of a sponsored research/project or another agreement, the University owns all Research Records generated at the University, under the purview of the University, or produced with University resources. To this end, the University is the primary owner and steward of such Research Records and is authorized to establish institutional expectations and requirements for the proper conduct and management of these Records.

The University will not claim ownership of Research Records created by a Student, unless the Records were generated or acquired through more than an Incidental Use of University resources, as part of Sponsored Activities, or pursuant to other written agreement(s), such as a Student hired to perform work for the University.

If a University Member who has collected, generated, or created Research Records ceases to have a relationship (e.g., employment, collaboration, or pursuit of a degree or training program) with the University, the University retains ownership of the Research Records as they exist at the time the relationship with the University ends, unless an agreement executed by the University transfers ownership to a third party.

B. Research Record Management and Maintenance

The University requires that University Members maintain Research Record management practices that enable the reproduction and validation of Research Outputs upon the request of the University, funding agencies, government authorities, and other authorities who question their integrity. These practices must comply with funder, publisher, and other requirements such as those stipulated in agreements to obtain data from external sources, as well as all applicable policies and regulations.

Research Records must be secured in accordance with all applicable laws, regulations, and University policies, and in accordance with stipulations in protocols approved by the Institutional Review Board or the Institutional Animal Care and Use Committee, when applicable.

To ensure that Research Records are appropriately maintained, a Responsible Individual is expected to develop a Data Management Plan ("DMP") prior to commencing a research project to document intended data management practices, as well as to convey the DMP to University Members they supervise and to collaborators who are engaged in the project. A written DMP may also be required by agreements in support of a funding application, research award, or

article submission. Individual funders or data providers may have varying format, content, and submission requirements that must be followed by researchers.

It is also expected that DMPs will be updated as needed for accurate reflection of data management practices. If a third party requests a DMP, it is the responsibility of the Responsible Individual to meet any associated deadlines and satisfy any requirements.

C. Research Record Storage and Access

Research Records must be stored in University owned or controlled or approved resources, facilities, or repositories, such as computer servers maintained through University administration. For some studies (e.g., field studies), Research Records may be collected outside University facilities, but must be transferred to University facilities as soon as practicable during the project lifespan.
Primary electronic Records should not be retained more than transiently on personal devices such as personal computers, tablets or smart phones, and must be archived on University-controlled servers. While copies of Research Records may be transferred to personal devices, they must be secured in accordance with University's security standards for remote work and all applicable laws and regulations that apply to the data types.

The Responsible Individual has the obligation to establish a system for managing and documenting parameters and conditions for storing and accessing Research Records, in accordance with funding agency requirements, University policies, and relevant laws and regulations. This includes communicating such parameters to University Members they supervise and collaborators, and ensuring that the system includes appropriate security measures, adheres to relevant agreements, and meets technical requirements to appropriately access the Research Records.

Access to Research Records must be provided in compliance with applicable University policies, research agreements, funding agency directives, publisher requirements, and regulatory mandates. For privacy and data security purposes, Research Records shall be available only to those who need such access and to the minimum amount necessary. The University Research Integrity Officer or their designee(s) must be provided access to Research Records upon request, as stipulated in University Policy RI 07, Research Integrity.

D. Research Data Transfer

Prior to Data Sharing, and when Research Data are transferred from the University to an external party, the Responsible Individual must determine in consultation with the Office of Sponsored Programs if an agreement (such as a data use or data transfer agreement) must be executed by the University to ensure that those who receive Research Data transfers have appropriate access rights, and the transmission and storage methods are secure. The Office of Sponsored Programs has jurisdiction to determine if an agreement is required prior to Data Sharing with another entity. Licensing of data is under the jurisdiction of the Office of Innovation and Entrepreneurship, in accordance with University Policy RI 10, Intellectual Property.

Generally, if a University Member leaves the University, they are entitled to take copies of Research Records (but not original Records) provided an appropriate agreement has been executed through the Office of Sponsored Programs. Research Records that cannot be duplicated may be transferred to a new institution provided an appropriate agreement has been executed, including a provision to make the materials available to University administration on request. A caveat is that when a research grant is transferred to another institution, typically the Research Records collected through the sponsorship of the award during the current grant lifespan (e.g., since the last competitive renewal of the grant) will be transferred to the institution that accepts the grant.

Pitt IT Security shall review and approve any third parties used to process, store, or transmit University Research Data when the data are classified as Restricted, Private, or are controlled unclassified information (CUI) as defined by NIST 800-171.

E. Research Data Retention

The University requires that Responsible Individuals retain Research Records after the final reporting or publication of a project or the end of Sponsored Activities in accordance with this section. The Retention Period may be dictated by funders, sponsors, publishers, contractual agreements, compliance or regulatory bodies, University's General Records Retention Schedule or other University policies, and applicable laws. If the obligatory Retention Period is not defined by another authority, Research Records must be retained for seven (7) years following the conclusion of a project or the conclusion of Sponsored Activities.

In addition, the below conditions may also alter the Retention Period for Research Records:

- **Translation and Commercialization:** Research Records must be retained until any patentable invention resulting from the work is protected by the filing of a patent application or, if a decision is made by the University not to file for patent protection, until rights to the invention are returned to the inventor. See Policy RI 10, Intellectual Property for further information.

- **Investigations, Allegations, Litigation:** Research Records must be retained if relevant to an investigation or legal proceeding, including, but not limited to, Research Data under a legal preservation notice or deemed relevant to research misconduct proceedings. See Policy RI 07, Research Integrity for further information.

- **Studies Using Human Subjects:** Research Records collected from human subjects, including those collected during clinical investigations overseen by the FDA and studies on children, may have prolonged required Retention Periods. The Human Research Protection Office can provide advice on Retention Requirements for studies on human subjects.

It is the responsibility of Responsible Individual to compare external requirements and determine the appropriate Retention Period for Research Records. The Responsible Individual should take

particular care to follow any requirements regarding Research Record destruction stipulated by data providers or specific terms of sponsorship or other agreements.

F. Noncompliance

University Members must comply with this Policy, and noncompliance may lead to sanctions through procedures stipulated in the Faculty or Staff Handbook, or the Student Code of Conduct, as applicable. Concerns relating to noncompliance may be reported through the Pitt Concern Connection, and will be referred to an appropriate University authority for review.

V. Contact Information and Public Accessibility

This Policy is posted under Research and Innovation on the Office of Policy Development and Management's website and can be found at: https://www.policy.pitt.edu .

For more information on the application of this Policy, including FAQs, please visit: https://www.orp.pitt.edu/resources/data-governance.

For questions related to this Policy, please contact the Office of Research Protections at: orp@pitt.edu .

VI. Related Authorities

University Policy AO 46, Gifts that Support Projects
University Policy RI 07, Research Integrity
University Policy RI 08, Responsibilities of Sponsored Research Investigators
University Policy RI 10, Intellectual Property
University Policy CS 30, Health Insurance Portability and Accountability Act
Pitt IT, Workstation Security Standards for Remote Work
Pitt IT, Data Risk Classification and Compliance
Pitt Library, Records Retention Schedule