

**UNIVERSITY OF ROCHESTER**  
**Interim Policy**  
**Access to and Retention of Research Data**

**Background**

Research data is created at the University of Rochester by faculty, staff, and students in the course of their scholarly activities and often while conducting sponsored programs funded by external sponsors. By tradition and for practical reasons, the creators of the data retain control to access and use of that data even though the University, through contractual or other agreement with external sponsors, may be required to hold title to or own the data. Because of those obligations, the University recognizes that it has responsibilities with respect to access and retention of data, particularly data generated under sponsored agreements.

Recent interpretations of federal regulations as well as congressional investigations into various issues concerning the government's support of research, including instances of scientific misconduct, have prompted the University to develop this policy for retention and access to data. Of particular concern to the University are the requirements of OMB Circular A-110 (Uniform Administrative Requirements for grants and agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations). Section \_\_\_\_53(a) specifies that financial records, supporting documents, statistical records, and all other records pertinent to an award *shall be retained by the institution*. In an April 11, 1994 letter, OMB has stated that the term "all other records pertinent to an award" encompasses all records that were produced in connection with the award, including laboratory data and primary data."

**Policy**

Research data created while individuals are pursuing research studies as faculty, staff or students of the University of Rochester, and data created by visiting scientist utilizing the facilities of the University of Rochester, are to be retained by the University for a period of three (3) years after submission of the final report on the research project for which the data were collected, unless a longer retention period is specified by the sponsor.

The original research data shall be in the custody of the senior investigator on behalf of the University, but must be returned to the University upon request of the Provost. Additionally, such data must be available to representatives of external sponsors of the research or designated governmental officials, when such access is appropriate. Such data must not be destroyed or altered during the time period referenced above unless explicit written approval for such disposition is received from the Provost or designee.

**INFORMATION RELATED TO POLICY STATEMENT**

**Definition of Data**

As used in this policy, data means recorded information, regardless of the form or the media which records it. The term includes computer software computer programs, computer databases, and documentation thereof), and data of a scientific or technical nature. For the purposes of this policy, the term does not include information incidental to award administration, such as financial, administrative, cost or pricing, or management information. In practice, scientific data includes, but is not limited to, materials contained in laboratory notebooks or other media such as computer disks and machine printouts. Data also includes both intangible data (statistics, finding, conclusions, etc.) and tangible data (notebooks, printouts, etc.).

**Investigator Responsibilities at the University**

It is important that investigators have the ability to document the results of research, both for the sake of assisting the University in meeting its scholarly and legal requirements as well as for the more traditional reasons of establishing priority for patentable items, publishing manuscripts, and the like. Senior members of research teams have obligations to discuss the responsibilities of data management and retention with other members of a research team. As a matter of practice, original data should be left with the senior investigator when a student leaves the institution, but copies of that data, where feasible to do so, should be provided to the student.

## **Investigator Responsibilities After Leaving the University**

When an investigator leaves the University, he or she must recognize that the University must have access to the data. It is neither feasible nor desirable for the original research records to remain at the University, but departing investigators must understand that they have an obligation to hold these data in trust for the University and that such data must be returned to the University if requested during the three (3) year period after submission of the final report on the research project for which the data were collected, unless a longer retention period was specified by the sponsor.

### **Further Information**

For additional information, please contact the Office of Research and Project Administration at X5-4031.