

Research Data Policy

Last Updated January 2017

I. Purpose

Accurate and appropriate documentation of the results of research is an essential feature of any research project. The University of Iowa (UI) and its researchers share an interest in assuring that research data are accurately recorded, appropriately used, retained for a reasonable period of time, and available for review under the appropriate circumstances. In addition, increased mobility among academic researchers has resulted in the need to provide for guidelines governing continued access to research data. This policy is written to address these issues at The University of Iowa.

II. Applicability

This policy shall apply to all UI faculty, staff, and students involved in the design, conduct or reporting of research at UI, and it shall apply to all research projects on which those individuals work, regardless of the type of research or the source of support for the project (external funding and UI supported).

III. Definition of Research Data

For the purpose of this policy, “research data” is defined as recorded information (in any media or format), factual material and the associated processes (including protocols) that are commonly accepted in the scientific community as both necessary and sufficient to document and support research findings.

IV. Ownership

In accordance with the UI's Copyright Policy, The University of Iowa generally owns the research data generated from all research, development, and related activities conducted under its oversight. The UI does not in this policy or in the Copyright Policy generally claim ownership of copyright in scholarly journal articles or other similar works created by UI academic authors based on such research data.

The UI's ownership of research data is derived in part from its role as a steward of public resources and extends from the UI's obligation to be legally and financially accountable for issues related to research data. These obligations include the responsibility to investigate allegations of research misconduct; to protect the right of researchers to access research data they collect; to ensure appropriate protections for humans and animals in research; to secure and protect intellectual property rights; and to provide and protect research data as required by terms and conditions of awards.

V. Rights and Responsibilities

On behalf of the UI, the Principal Investigator (PI) is the custodian of the research data and is ultimately responsible for meeting the collection and retention requirements relating to research data organized with documentation for access and use. However, because other members of the research team (Co-PI, senior researchers, program staff, trainees, or students) may have obligations for research data collection and retention, this policy uses the term “investigator” to refer to all such team members.

A. Collection and Retention

Investigators are responsible for the orderly collection, retention, cataloguing, and proper storage of research data. Investigators will also ensure retention of complete records to document the methods used; accuracy of the research data collected and interpreted; and compliance with award terms and university requirements, including appropriate protections for humans and animals in research, including safeguards for protecting privacy and confidentiality of research subjects. Requirements related to retention and security of private and proprietary data are described in the IT security policies at <http://cio.uiowa.edu/policy>.

Research data must be retained by the investigator(s) for a minimum of six years if the study involved the collection of protected health information. For all other research, data must be retained by the investigator for a minimum of five years after the final closeout of the funded project or resulting publication, whichever occurs later. Some circumstances may require that research data are kept for a longer period of time. Such circumstances may include, but are not limited to, investigation of allegations regarding the integrity of research, preservation of intellectual property rights, completion of student graduation requirements, and requirements imposed by the federal government or research sponsors. Whenever possible, the original research data will be part of the research data records. Research data will ordinarily be retained in the investigator’s lab or the unit where they are created, but in any event, in facilities owned or leased by the UI and consistent with any sponsored agreements.

B. Access

As owner of the research data, the UI has the right to access the original research data to ensure that it meets its obligations of legal and financial accountability for the research data. The investigator(s) will provide such access to the University upon reasonable request. The investigator(s) will also provide access to authorized representatives of extramural sponsors of the research and/or to designated governmental officials, where such access is deemed appropriate by the UI to ensure its accountability for the research data. The PI will also facilitate requests for access to research data by members of the research team who were involved significantly in the design, conduct, or reporting of the research data

C. Sharing of Research Data

Data collected or created in the process of research developed with federal funds should be shared upon request for non-commercial purposes in accordance with data sharing policies adopted by federal agencies. It will be the responsibility of the PI to follow the requirements imposed by any sponsors of research and, as applicable, the informed consent document and conditions of IRB approval.

VI. Transfer

In the event the Principal Investigator leaves the University and wishes to move the project to another institution, the PI may not remove nor grant to others the right to remove the original data from the UI without the express prior written approval of the Vice President for Research. If the research data has been collected conducting human subjects research, the IRB must review and approve the transfer prior to final signoff by the Vice President for Research.

Approval will not be granted unless there is a written agreement in place between the UI and the PI's new institution in which the new institution accepts its custodial responsibilities for the research data, agrees to obtain its own IRB approval prior to using any identifiable human subject research data collected at UI, and agrees to give the University of Iowa access to the original data in the event that should become necessary. Identifiable data collected conducting human subjects research must have IRB approval in place at the new institution prior to use. Prior to leaving the University, the PI will identify in writing to his or her departmental executive officer or equivalent person those research data records he or she has in his or her custody at the time and those research data records the PI wishes to take to the new institution. If transfer of the research original research data is not approved, the PI may take a copy of the research data at his/her expense, except as restricted by the need to protect proprietary rights, by contractual confidentiality obligations, or as restricted by law (e.g., HIPAA) or regulation. In the case of industry-initiated clinical trials, the project data will not be transferred.

An individual researcher (other than the PI) who leaves the UI may request copies of research data for any part of the project in which s/he was significantly involved in the design, conduct, or reporting of research. In such circumstances, subject to the restrictions described above, a copy of the research data may be provided to the individual within a reasonable time period after the request at the departing individual's cost. In no event will the original research data be provided to any such individual.

VII. Dispute Resolution

Any disputes regarding requests for original research data, copies of data, or transfer of research data will be resolved by the Vice President for Research.