

Standard Practice Guide Policies

Research Data Stewardship Policy

303.06

Applies to: Faculty, students, other trainees, staff, and all other members of the University of Michigan's academic community

I. PURPOSE OF THE POLICY

Responsible stewardship of Research Data is critically important to maintain rigor and trust in research and scholarship, meet sponsor requirements, and serve the broader public mission of the University in “creating, communicating, preserving, and applying knowledge.” Both the University and its Faculty and Staff have responsibilities managing the use, distribution, and preservation of Research Data produced through University activities. This Policy sets out expectations and guidance for the stewardship of Research Data, focusing on issues of ownership, sharing, and retention.

II. DEFINITION OF RESEARCH DATA

“Research Data” as applied in this Policy means the recorded material commonly accepted in research communities as necessary or useful to validate, reconstruct, evaluate, replicate, and/or generate findings. This definition extends to a broad range of disciplines spanning quantitative and qualitative research and scholarship, from the humanities to the natural sciences and medicine. This definition also applies to Research Data regardless of whether they are used to support scholarly publications, and is independent of the media on which they may be recorded. For the purposes of this Policy, supporting information required to interpret the data, such as computer code, metadata, and observational records including laboratory notebooks or other forms of documentation are included, but preliminary data (as defined in the procedures guide), analyses, drafts of publications, plans for future research, peer reviews, communications with colleagues, and scholarly works as defined in SPG 601.28 (Copyright) are not. This definition does not apply to non-research clinical data, or to patents, inventions, copyrights, or other administrative data or property governed by separate University policies, including those cited below.

III. OWNERSHIP OF RESEARCH DATA

For all research and scholarship activities performed by or under the auspices of someone with a formal University appointment or role (e.g., faculty, staff, or student), regardless of location, intent, or funding source, the University owns any resultant Research Data. Such activities include but are not limited to: Research Data generated as a result of grants, fellowships, internal funds, or other forms of sponsorship administered by the University; Research Data that faculty, staff, or students generate as part of employment or formal research roles; and/or Research Data generated using equipment, facilities, or other unique access afforded to University researchers.

When allowable, the University has the ability to grant rights to Research Data to others, such as through contracts, data use and/or transfer agreements, licenses, or material transfer agreements. Principal Investigators or their delegates are responsible for the management and stewardship of Research Data on behalf of the University, including the curation, analysis, or dissemination of Research Data in accordance with the terms of this Policy. Data generated through a sponsorship agreement or acquired from a third party are subject to the terms of any agreement under which they were acquired, and researchers should work with the unit responsible for licensing the data, or the Office of Research and Sponsored Projects, to understand their responsibilities in these situations.

IV. ACCESS TO RESEARCH DATA

To increase widespread access and promote reuse of Research Data, Principal Investigators or their delegates should strive to make Research Data publicly available when possible. In particular, the Research Data necessary to support findings in publications or other scholarly outputs should be made immediately available at the time of publication. Protected or sensitive Research Data (e.g., confidential data or data subject to human-subjects protections) should not or may not be shared outside of the University without ensuring compliance with applicable community norms, laws, regulations, agreements, grants, contracts, and other University policies. This Policy does not introduce new requirements, rights, or protections for sharing such Research Data. Principal Investigators or their delegates seeking to change any approved protocols or agreements must always receive prior approval from the cognizant office responsible for overseeing the relevant data protection program [e.g., Institutional Review Board (IRB), Export Control Office, and others].

When sharing Research Data publicly, the University expects all researchers to make them available in a manner that is consistent with FAIR¹ principles (findable, accessible, interoperable, and reusable). When engaging with community partners to collect Research Data, researcher conduct should be consistent with best practices (e.g., CARE principles¹ of collective benefit, authority to control, responsibility, and ethics when working with indigenous communities). When applicable, Research Data sharing plans

should be co-developed with any community partners so that all parties are in agreement with how any resulting data will be curated or released for archiving or reuse purposes.

V. RETENTION OF RESEARCH DATA

Research Data must be stored and curated internally for a minimum of seven years after final closeout of a project or publication of the data, whichever occurs later. Allowable exceptions include when an applicable sponsor or data use agreement, contract, or grant requires a shorter or longer period of time. In rare cases when Research Data storage using available University systems is not possible or becomes cost-prohibitive for the entire seven-year period (e.g., for very large datasets), the Principal Investigator or their delegate must work with their unit and/or Information Technology Services to identify alternative storage or archiving solutions.

Principal Investigators are responsible for retaining Research Data generated by supervisees (including students and staff) when they leave the institution or change positions. In cases when a Principal Investigator leaves the University before the term of the retention period expires, they must ensure original Research Data remain at the University in their home unit or another unit-approved location for the appropriate length of time (described above). Transferring copies of Research Data that is not publicly available to individuals or entities outside the University, unless previously defined in an existing agreement, should proceed through the completion of a data transfer and use agreement.

VI. PROCEDURES

Procedural guidelines for this SPG are available at <https://research.umich.edu/wp-content/uploads/2023/06/procedures-guide-1.pdf> (<https://research.umich.edu/wp-content/uploads/2023/06/procedures-guide-1.pdf>)

¹ <https://www.go-fair.org/fair-principles/> (<https://www.go-fair.org/fair-principles/>)

² <https://www.gida-global.org/care> (<https://www.gida-global.org/care>)

Notes

This policy goes into effect on January 1, 2024.

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June 27, 2023

Applies To:

Faculty, students, other trainees, staff, and all other members of the University of Michigan's academic community

Owner:

Last Office of the Vice President for Research

Updated:

June **Primary**

27, **Contact:**

2023 Office

of

Next the

Review Vice

Date: President

June for

27, Research

2028

Related Policies:

Institutional Data Resource Management Policy (</policy/601.12>)

Policy for Research with Human Participants (</policy/303.05>)

Policy Statement on the Integrity of Scholarship (</policy/303.03>)

University of Michigan Technology Transfer Policy (</policy/303.04>)

Who Holds Copyright at or in Affiliation with the University of Michigan (</policy/601.28>)

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