

Research Data Stewardship Policy Procedural Guidelines

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Key Definitions

Data Archiving - Activities that ensure that data are properly selected, stored, and can be accessed, and for which logical and physical integrity are maintained over time, including security and authenticity. (Adapted from the [CODATA rdm-terminology website](#))

Data Retention - A period of time for which the data and its associated records are stored in ways where they are readily accessible for a designated period of time. (adapted from the [Dictionary of Archives Terminology](#))

Data Reuse - The use of data outside of its original intention (Adapted from the [CODATA](#)).

Data Sharing - The ability to distribute or make a data set accessible to multiple users, applications or organizations. (Adapted from the [CODATA rdm-terminology website](#))

Data Storage - A means of persistently storing collections of data, such as a database, a file system or a directory. (Adapted from [CODATA](#))

Metadata - Information created, stored and shared to describe and contextualize data, allowing people and machines to interact with it. (Adapted from "[Understanding Metadata](#)")

Preliminary Data - Data generated from small scale research projects to evaluate the feasibility of larger scale research, test approaches or protocols, or provide proof of concept or evidence

to support a working hypothesis, but which is otherwise not useful for validating, reconstructing, evaluating, and/or replicating findings (Adapted from "[Gathering preliminary data](#)").

Project Closeout - Project closeout refers to the end of a research project's performance period, sponsored or otherwise, and all applicable administrative actions and required work of the project have been completed. See more information [from ORSP](#).

Principal Investigator - A University of Michigan (U-M) employee having the background and training in scientific and administrative oversight necessary to conduct and manage a sponsored project. See full definition [from ORSP](#).

Scholarly Works - Scholarly Works are distinct from Research Data in that they are authored by faculty within the scope of their employment as part of or in connection with their teaching, research, or scholarship. Common examples include: lecture notes, case examples, course materials, textbooks, works of nonfiction, novels, lyrics, musical compositions/arrangements and recordings, journal articles, scholarly papers, poems, architectural drawings, software, visual works of art, sculpture, and other artistic creations, among others, regardless of the medium in which those works are fixed or disseminated. See full definition in [SPG 601.28](#).

Rights and Responsibilities of Researchers

University researchers are stewards and custodians of Research Data. Because [Principal Investigators](#) (PI) are responsible for the design, conduct, and/or reporting of research for all supervisees and staff, PIs have heightened responsibilities with respect to Research Data that include at least the following, as conditioned by this and other University policy and the terms of any applicable grants and/or contracts:

- A. Ensuring that sufficient records are created and maintained to document the accuracy of data collection and interpretation;
- B. Creating and/or adopting an orderly system of Research Data organization and documentation;
- C. Ensuring institutional approval from applicable oversight committees, including but not limited to institutional review boards (IRB), institutional biosafety committee (IBC), and the institutional animal care & use committee (IACUC);
- D. Ensuring all members of the research team have completed all required research-related trainings, when appropriate, including but not limited to Responsible Conduct of Research and Scholarship training;
- E. Establishing and maintaining appropriate procedures for the protection of Research Data and other essential records, in compliance with requirements of applicable grants and/or other contracts, and in compliance with applicable community norms, laws, regulations, agreements, grants, contracts, and other University policies;
- F. Maintaining confidentiality of Research Data, where appropriate;
- G. Maintaining or putting into place appropriate data use agreements for the sharing of Research Data;

- H. Establishing plans for dissemination of Research Data, including but not limited to making data publicly accessible and/or publishing data in scholarly works;
- I. Assigning collaborators or other researchers the ability to access and (re)use Research Data, including members of the research group, researchers at other institutions, or supervisees or trainees who leave the University but still require access to data to complete their scholarly work.

A PI may choose to delegate this work (e.g., to others within a research group) in conjunction with appropriate University offices or practices; however, the PI will remain responsible for achievement of these duties. PIs are expected to ensure all supervisees collecting Research Data as part of their employment, including faculty members, staff, or students acting as employees or research assistants (e.g., graduate or undergraduate student researchers), comply with this policy. In contrast, the Research Data Stewardship Policy generally does not apply to undergraduate or graduate students performing research and scholarship solely as a part of their coursework (e.g., research for a term paper or senior thesis).

Any researcher, upon request of the University, must promptly provide the University with Research Data and related records. In instances where the integrity of Research Data is in question, the University will take all necessary steps to secure the Research Data in a manner specified by University policy on the integrity of scholarship (SPG 303.03).

Rights and Responsibilities of the Institution

The University has the right of access to Research Data arising from all University research, regardless of the location or status/rank of the researcher. When necessary or desirable to ensure appropriate access, the University has the right to take physical custody of original Research Data and supporting records (e.g., during an investigation of alleged research misconduct or research noncompliance). Researchers, including those that leave the University, must fully cooperate in the same, regardless of status/rank.

The University also assumes an obligation to provide a baseline level of support for management and storage of data as a University asset, and will work with investigators to explore alternative solutions if U-M systems are not sufficient.

Data Retention and Storage

Because this Policy's definition of Research Data overwhelmingly consists of digital media, adequate retention of Research Data records requires [robust digital storage planning and appropriate data security measures](#). Physical media (e.g., laboratory or other observational notebooks) can also fall under the definition of Research Data used here, if not transcribed electronically as part of metadata associated with a dataset.

The following typically are not required to be retained under normal circumstances, but could be required to be released to University officials under circumstances described above (including, but not limited to investigations or litigation): duplicates of original records; preliminary drafts of letters, memoranda, reports, worksheets, and informal notes that do not represent significant

steps and/or decisions in the preparation or analyses of original records; books, periodicals, manuals, training binders, newspapers and other printed material obtained from external sources and retained primarily for reference; and blank forms.

Any of the following circumstances may justify longer periods of retention outside the period of retention specified in this Policy:

- A. If applicable regulations, federal oversight, sponsor policies or guidelines, journal publication guidelines, or other University policies or guidance require longer retention, all applicable sources must be reviewed and the Research Data must be kept for the longest period of time applicable;
- B. If there is anticipated future use of the Research Data beyond the stated retention period (e.g., future publication);
- C. If any charges regarding the research arise (such as allegations of scientific misconduct, improper charging of costs, research noncompliance, or conflict of interest), Research Data must be retained at least until such charges are fully resolved or for such other period as may be required by University policy or regulation;
- D. If other adequate period of time is necessary or desirable to enable appropriate responses to questions about accuracy, authenticity, primacy, and compliance with applicable community norms, laws, regulations, agreements, grants, contracts, and other University policies governing the conduct of the research;
- E. Research Data from human participant research studies that must be stored or managed over a longer time period as consistent with applicable Institutional Research Board (IRB) regulations;
- F. Research Data must be kept for as long as may be necessary to protect any intellectual property and complete patenting and licensing procedures for inventions resulting from University research, taking into account guidance from Innovation Partnerships and the Office of the Vice President and General Counsel;
- G. If litigation or other dispute resolution, claims, financial management review, or audit related to the research project is started before the expiration of the seven-year retention period defined in the policy, or commenced after the seven-year retention period but the relevant Research Data have not been destroyed, the Research Data and other project records must be retained until all such litigation/dispute resolution, claims, financial management review, audit findings involving the records have been resolved and final action taken, or as required by law or instruction by the Office of the Vice President and General Counsel.

Researchers that Leave the University

It is the responsibility of the schools/colleges/units to develop exit processes in accordance with this Policy through which the applicable school/college/unit can determine what Research Data and supporting records, if any, must be retained on-campus as originals or copies. Plans must take into account the needs and rights of those researchers who remain at the University, the need to maintain the integrity and regulatory oversight of continuing or ongoing research, the need to comply with terms and conditions in sponsored research agreements or any other

applicable agreements or protocols, and the needs of the departing PI to complete the research project if applicable.

When seeking to transfer copies of the original data from the University to a new institution, the PI must complete a [data use agreement](#) (DUA) through their home unit and the Office of Research and Sponsored Projects (ORSP) at the time of offboarding. The University, in its sole discretion, has the right to agree to transfer only copies of Research Data and/or supporting documentation and records, or to refuse transfer of any Research Data. IRB review and approval to use the data may also be needed from the institution to which the data will be transferred.

Data Sharing, Archiving, and Reuse

To ensure long-term access of research beyond the retention time stated in this Policy, the University strongly encourages researchers to make Research Data associated with publications or other scholarly outputs publicly available and permanently archived, preferably in funder-approved and/or community-developed disciplinary repositories, or in Deep Blue Data, the [University's own Research Data repository](#). Adhering to common disciplinary practices (e.g., depositing other related materials, code, or datasets into repositories) is also strongly encouraged whenever possible.

Making Research Data publicly available [has numerous benefits](#), including contributing to the transparency, rigor and public value of research and scholarship. Within the research community, enabling the use and reuse of existing Research Data extends the impact and accessibility of University research, consistent with the University's public mission.

None of these provisions is intended to subvert existing state or federal regulations, or alter a PI's traditional ability to hold Research Data proprietary, or to require others to hold Research Data proprietary, until the results of the research have been published and the terms of the research agreement or project have been fulfilled. If Research Data are outside the period of retention specified in this Policy, the destruction of those Research Data are at the discretion of the PI unless the department, school/college/unit, or other University office specifically requests the retention of the Research Data. Processes for destruction or discarding of Research Data must follow applicable federal regulations, University policies on record retention and data disposal, sponsor requirements, and other applicable rules and guidelines.

Dispute Resolution

Subject to other stated grievance procedures for academic unit(s), if a dispute arises concerning a researcher's access to Research Data, an initial effort to resolve the dispute will be made by the chair or delegated member of leadership of the relevant academic unit(s) involved. Any unresolved disputes then shall be resolved in the first instance by the unit's associate dean for research.

Research Data Associated with Physical Materials

These procedures apply specifically to Research Data and supporting records; however, it is understood that many times Research Data may be closely linked with other materials, such as collected samples, museum specimens, or other types of physical objects. Researchers working with those other types of materials are expected to follow all applicable rules and regulations related to the collection, documentation, and maintenance of those materials, as well as to standard disciplinary practices. For example, researchers collecting or working with museum-derived materials or biospecimens should strive to ensure their data are linked to appropriately preserved vouchers. Researchers at other institutions who may be generating data from University-owned artifacts and specimens on loan assume responsibility for linking them to vouchers and stewarding Research Data according to their institutional policies and disciplinary best practices.

Research Commercialization

The University supports the commercialization of university innovation and Research Data in ways that benefit the public through the creation of new products and services which create economic prosperity. Investigators are encouraged to consult with Innovation Partnerships to ensure appropriate licensing structures that allow Research Data to be made broadly accessible to the public and scientific community while preserving commercial rights. In general, release of Research Data will be done via a dual license structure that allows free access for non-commercial academic and scientific research users and provides traditional commercial use rights via a separate license mechanism for companies and for profit organizations.

Sensitive or Protected Data

Some types of Research Data are sensitive or require special protections. For a listing of resources available to U-M researchers, see the ITS [sensitive data guide](#).

Additional Resources

For additional resources and best practices on how best to follow the above expectations, please see the [U-M Research Data Stewardship Initiative website](#) and associated materials.