Electronic Research Data Security Policy

Research data are created at Montana State University by faculty, staff, students, post-doctoral fellows, scholars and visiting scientists in the course of their scholarly activities and in conducting sponsored activities funded by external agencies. The Principal Investigator is responsible for ensuring that reasonable standards for data collection, retention and security are in place for all research projects.

For the purpose of this policy, “data” is defined as electronically recorded primary information regardless of form or the media on which it may be recorded. The term includes technical data, source code or algorithms developed during the course of the program, laboratory worksheets, memoranda, notes or exact copies thereof that are the result of original observation and activities of a study and are necessary for reconstructions and evaluation of the report of the study.

Policy:
The investigator, usually designated Principal Investigator, who bears primary responsibility for the overall conduct of the research, sponsored, or scholarly activity, is responsible for collection, management and retention of research data and providing access to it including any agency requirements for sharing data.

Procedures:
Principal Investigators should adopt an orderly system of data organization and should communicate the chosen system to all members of a research group and to the appropriate administrative person. Research data generated while individuals are pursuing research, scholarly, or sponsored activities as faculty, staff, postdoctoral fellows, scholars, students or visiting scientists must be retained by the principal investigator (PI) for a period of three years after submission of the final report on the project for which the data were collected. If the retention requirements specified in other statutes or external agency’s regulations are longer, the agency requirements will apply.

When submitting a Proposal Clearance Form, the PI will assure he/she has read and agrees to adhere to MSU security guidelines. http://www.montana.edu/itsecurity/guidelines/generalguidelines.pdf

PI Departures from MSU: If the PI is transferring to a new institution, the original data may be transferred to the new institution. However, the investigator may be asked by MSU administration to leave copies of the original data with the institution. Investigators should note that many contractual agreements require the sponsor’s consent before data are transferred or removed. Before transferring the original, the PI should ensure that any special conditions stated in the grant, contract or cooperative agreement are met.

Departing investigators that transfer original data are obligated to hold original data in trust for Montana State University for the three year retention period or in accord with the applicable funding/regulatory agency requirements, whichever is longer. These data must be returned to the University, if requested. In addition, during the required retention period, such data must be available to representatives of external sponsors or designated governmental officials as appropriate.

Internal control considerations, if applicable: n/a

[Reviewed February 16, 2012]