Research Data Policy

Purpose:

This policy defines the shared responsibilities of Cornell researchers and Cornell University in collecting, retaining, securing, and sharing research data. To ensure the integrity of the research process and to comply with federal regulations, the university must retain research data in sufficient detail and for an adequate period of time to enable appropriate responses to questions of accuracy, authenticity, primacy, and compliance with laws and regulations governing the research.

Collection and Retention of Research Data

- Collection, retention, and sharing of research data involving human subjects must comply with Cornell Institutional Review Board (IRB) policies\(^1\) as well as all applicable federal, state, and local laws, regulations, policies, and guidelines.
- Collection, retention, and sharing of research data involving vertebrate animals must comply with Cornell University policy 1.4, “Care and Use of Live Vertebrate Animals in Research and Teaching” as well as all applicable federal, state, and local laws, regulations, policies, and guidelines.
- Research data must be retained for a minimum of seven years after the final project closeout. Original primary data must be retained unless the Vice Provost for Research approves retaining summaries or other secondary data based on compelling justification in special cases. Longer periods of retention are required in some circumstances, such as:
  - The terms of a sponsored research agreement require a longer retention period;
  - The Center for Technology Licensing deems retention is required to protect intellectual property;
  - Allegations regarding the research, such as academic misconduct or conflict of interest arise and remain unresolved. Research data must be retained until such allegations are fully resolved;
  - Legal action, investigation or official inquiry related to the research is ongoing. Research data must be retained until such issues are fully resolved.
- Beyond any required period of retention, the destruction of research records is at the discretion of the PI according to college or department policy or the norms of their field. Records will normally be retained in the unit where they are produced. Research records must be retained in university facilities, unless the Vice Provost for Research grants specific permission to do otherwise based on a compelling justification and assurance that data will be maintained with appropriate oversight.

Responsibilities:

University ownership and stewardship of the scientific record for projects conducted by university faculty, staff, and students through the use of university facilities and resources, is based on federal regulation (e.g. 2 CFR §200.0-251), and sound management principles. The responsibilities of the university in this regard include, but are not limited to:

1. Protecting the rights of faculty, staff, and students, including, but not limited to, their rights of access to data from research in which they participated;
2. Complying with the terms of sponsored project agreements;

\(^{1}\) Institutional Review Board for Human Participants https://www.irb.cornell.edu/
3. Ensuring the appropriate use of animals, human subjects, recombinant DNA, biological agents, and radioactive materials;
4. Securing the intellectual property rights of the university;
5. Supporting, through the Office of the Vice Provost for Research, the PIs research data management efforts;
6. Resolving disputes between researchers over data control or access;
7. Approving any transfer of original research data off-campus for archival or other purposes; and
8. Facilitating the investigation of charges, such as academic misconduct or conflict of interest.

The PI has the right and authority, within the limits set by the superseding authority of Cornell University and any applicable terms within sponsored agreements, to control the use of, and access to, any research data conducted under their management or supervision, including the use of data in scholarly publications and presentations.

The PI is responsible, with support from the Office of the Vice Provost for Research, for maintaining and retaining research data in accordance with this policy. Specifically, the PIs are responsible for:

1. Collecting, maintaining, retaining, and providing access to research data for the periods required by this policy;
2. Determining, according to the sponsored research agreement, the data use agreement or other requirements, such as whether research data is public, confidential or otherwise restricted;
3. Assuring compliance with any restrictions mandated by federal International Traffic in Arms Regulations or Export Administration Regulations, including restrictions on publication or sharing with non-U.S. citizens.
4. Securing and controlling access to research data and ensuring that required protections can be provided;
5. Determining how data will be published or presented;
6. Ensuring that data are available for review by the university, sponsors, journals and others as described in this policy, journal policies, and sponsor requirements; and
7. Informing CTL, through the Technology Transfer Process, of any data supporting a new invention.2

Security of Research Data

- Research data that incorporates confidential information such as, personally identifiable human participant data, trade secrets, or export-controlled information, must have the same security protections and be treated in the same manner as Institutional Information classified as Confidential (Level 1) Information under Cornell policy 5.10 Information Security.
- Suspected or proven disclosure or exposure of confidential or otherwise restricted data must be immediately reported to the Office of the Chief Information Officer. If the data includes data from human participants in research, the Cornell IRB must also be informed.
- Note: Costs associated with the preservation and security of research data during the term of a sponsored award are typically allowable direct costs of conducting research. The Cornell University IT department provides secure cloud storage at very affordable rates. For example, a few terabytes, more than sufficient for several years of research data for most faculty, will cost less than a few hundred dollars per year. Those faculty who work with extremely large data sets may want to take advantage of archives available to their discipline.

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Access to Research Data

- The university has the right to access research data for all research that is performed at the university or under its auspices, supported by university administered funds, or conducted using university facilities.
- The university has the right to take custody of research data to ensure needed and appropriate access, for example, to facilitate a response to an allegation of research misconduct.
- A PI may grant Cornell researchers and staff access to research data for research or administrative purposes, subject to all university rules, state and federal laws, and contractual obligations relevant to the data. Access to research data by researchers who are not Cornell University employees is governed by the data use agreement executed with such researchers.
- Faculty and staff who give researchers access to data must inform them, in writing, of any limitations or restrictions on the use or dissemination of the data.
- When a PI or co-investigator leaves Cornell, they may take copies of research data for projects on which they have worked. The purposes for which such data may be used are dependent on agreement with the PI, or as formally agreed-upon beforehand in a data use agreement. In all cases, the primary research data must be retained at Cornell unless the Vice Provost for Research specifically authorizes moving it to another institution.

Publications

The PI has the right and responsibility to ensure that research is accurately reported to the scientific and academic community, as well as to select the vehicle most appropriate for publication or presentation of research data and results. In the case of research conducted with co-PIs, the co-PIs jointly share this right and responsibility unless it is expressly written otherwise in the manuscripts.

Cornell University handles disputes regarding authorship as an academic issue, according to Cornell Academic Misconduct Policy 1.2. All persons listed as authors on publications or presentations must meet accepted criteria in their field for authorship credit, and only such persons may be listed as authors.

Definitions:

- **A researcher** is any faculty member, student, postdoctoral researcher, research associate or fellow, or other person involved in the design, conduct or reporting of research.
- **Research data** is any information needed to reconstruct and evaluate reported results of research and the events and processes leading to those results. This includes technical data in any form, digitally recorded data, databases, laboratory worksheets, notebooks, study protocols, survey records, memoranda, notes, case histories, samples, statistics, findings, and conclusions that are the result of original observation, experimental methods, or analysis.³
- **Final closeout**, for sponsored projects, means the award period has ended, and all deliverables have been submitted. For non-sponsored projects, it means all work has ceased and no further publications related to the project are anticipated.
- **PI** is the Principal Investigator, or in the case of student-led research projects, the Faculty Advisor.

³ Nothing in this definition is intended to supersede an agreement with a human research subject to code or otherwise deidentify personal information or specimens they provide for research purposes.