VANDERBILT ⬥ UNIVERSITY

Research Data Governance Framework

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REASON FOR FRAMEWORK

Vanderbilt's Research Data is a high-value asset. It supports delivery of Vanderbilt's central mission of scholarly research and related contributions to the community and society at large. Data aggregation and management are key components of a successful research enterprise. Sharing data reinforces open scientific inquiry, encourages diversity of analysis and opinion, and promotes new research. Management of Research Data is thus a necessary part of effective research conduct and administration at Vanderbilt.

This document defines an institution-wide framework of principles and decision-making structures and roles for Research Data governance. This framework will enable Vanderbilt to manage Research Data intentionally and consistently to deliver maximum value in support of the institutional research mission.

Successful implementation of this framework will provide a measurable improvement in Research Data security and usability. It will also enhance the data awareness and capability of those creating, accessing, and using Vanderbilt Research Data. The demands of information security and mitigating risk will be balanced with the demands of maximizing scholarly impact and value to the research community and broader society.

This framework is supported by related policies, standards, and guidelines. These may develop and evolve as technology, research subjects, and the needs of the institution evolve.

This framework will be periodically reviewed and updated to ensure it remains current.

FRAMEWORK SCOPE

This framework applies to all persons who generate or utilize Research Data at the University. This group includes students, faculty, staff, researchers, contractors, visitors, and any others accessing the University's Research Data or computing, storage, and network facilities. It applies in all locations where the University conducts its activities without geographical limits, subject to applicable local laws and regulations.

This framework applies to all Research Data owned or held by the University, under the University's custody, or otherwise present in the University's network or computing environment. This Research Data may be held on any of the University's premises or in any external or cloud-based IT infrastructure licensed, rented or contracted by the University or on the University's behalf. This framework also includes Research Data held on personal or grant-

funded devices on the University's behalf.

Oversight of this Research Data governance will be led by the Vice Provost for Research or his/her designee. However, when Research Data is governed by specific terms or conditions regarding ownership, retention of, and access to data, the provisions of that agreement will supersede this framework.

DEFINITIONS

Research Data includes any records that are necessary for the reconstruction and evaluation of reported results of research and the events and processes leading to those results, regardless of the form of media on which they may be recorded. Research Data is a type of Technology assigned to Vanderbilt consistent with the VU [Policy on Technology and Literary and Artistic Works.](#)

FRAMEWORK

A. Principles

Research Data governance is an institution-wide framework of principles and decision-making structures and roles. This framework will enable Vanderbilt to manage its Research Data intentionally and consistently to deliver maximum value and scholarly impact in support of the institutional research mission.

This framework will uphold moving Vanderbilt toward complying with the following principles:[1]

- Research Data is a valued asset.
    - Research Data has value on par with other assets, such as buildings, vehicles, or money.
    - Research Data is essential to promoting open collaborations that enhance Vanderbilt's scholastic reputation and impact on society.
- Research Data is managed.
    - Research Data should be appropriately managed (i.e., collected, stored, protected, and used) throughout its life cycle.
    - Research Data management should be a core capability that is an integral part of the University's culture and shared with faculty, staff, students, and other members of the Vanderbilt research ecosystem (e.g., post-docs).
    - Research Data should have named personnel roles with specific responsibilities for the curation of Research Data, from data entry to archive or disposal, should be defined, trained, and appropriately resourced.
- Research Data is fit for purpose.
    - Research Data should be as accurate and complete as possible (given the constraints of the data and how it was collected), at the appropriate quality for its primary purpose and all other known legitimate uses.
    - Research Data should be monitored so it can be trusted. Research Data owners have the role of accountability and oversight to assure this trust, with key decisions and actions documented at an appropriate level of detail.
- Research Data is accessible, comparable, and reusable.

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[1] In the discussion below the term "should" reflects a "goal" or "intent" that researchers should aspire to achieve rather than a normative regulation that must be obeyed.

- o Research Data should be made available where and when required, subject to appropriate security constraints and the need to protect the integrity of the research process, especially in a competitive environment for funding, originality, impact, intellectual property disclosures, etc.
- o Standards (e.g., metadata standards) will be consistently applied to encourage reuse, and promote a common understanding of context, meaning, and comparability, (e.g., to help ensure reproducibility of results by other researchers).
- Research Data is secure and compliant with regulations.
  - o Research Data should be protected against unwanted, or unauthorized access. Appropriate confidentiality should be maintained.
  - o Research Data should be acquired, used, stored, and disposed of in compliance with the law and applicable standards, regulations, and contractual obligations.
  - o Research Data integrity protects the university from reputational, financial, and regulatory damage, as discussed in the Data Classification Policy document.
  - o Regulated Research Data should be identified and monitored for information security breaches to support compliance with necessary agencies and contractual obligations (e.g., SSN notification requirements vary by state)

B. Roles and Responsibilities

Vanderbilt must retain Research Data in adequate detail and long enough to enable appropriate responses to questions about accuracy and compliance with laws and regulations governing the conduct of the research. It is ultimately the responsibility of each principal investigator (PI) to determine what should be retained under this policy.

Research Data Governance Structure

The activities of Research Data governance are applying policies, standards, guidelines, and tools to manage Research Data at Vanderbilt. Responsibility for the activities of Research Data governance is shared among the roles listed below. Descriptions of roles and responsibilities below provide the framework of how Research Data governance should be implemented and maintained.

Research Data Governance Oversight

Oversight of Research Data governance (RDG) will be at the Office of the Vice Provost for Research (OVPR) level. Deans (or their delegates) at Vanderbilt's Schools and Colleges are accountable for ensuring that RDG is practiced in their areas, including identifying Data Owners.

OVPR, or a designated committee or group at Provost-level, will provide oversight of the activities of a Research Data Governance Committee (RDGC). This OVPR-level group will sign off policy, support appropriate cultural and behavioral change, and allocate appropriate resources to RDG activities. The RDGC will report periodically to OVPR on how it is delivering value to support institutional priorities, commensurate with its resourcing.

Research Data Governance Committee

Vanderbilt University's Research Data Governance Committee (RDGC) is the body responsible for developing and leading the implementation of policy and practices for Research Data governance.

The RDGC will develop tools, guidelines, principles, and policies as required on topics such as Research Data classification, access, usage, integrity, retention, roles/responsibilities, incident response, and integration. The RDGC is responsible for prioritizing Research Data governance initiatives and supporting Research Data management for institutional initiatives. The RDGC is also responsible for cultivating a Research Data management culture that provides value to the institution, particularly to faculty and researchers at Vanderbilt.

The RDGC is chaired by the Vice Provost for Research or his/her designee, which is a faculty position. The work of the committee is coordinated by the Director of Research Data Governance. The RDGC membership will be largely comprised by faculty members at Vanderbilt. It will also include representation from the Faculty Senate, the Institutional Data Governance Committee (DGC), as well as Data Governors and Investigators. Changes to the RDGC membership must be approved by the RDGC Chair.

Director of Research Data Governance

The Director of Research Data Governance is responsible for the day-to-day operation of the Research Data Governance Program at Vanderbilt. They will convene the RDGC on a regular basis and will work with the committee and the Research Data Owners and Stewards to resolve data governance related issues. This position reports to the Vice Provost for Research or his/her designee.

Additional responsibilities include:
- Communication of Research Data Governance Committee outcomes.
- Decisions on day-to-day matters of Research Data governance and directing decision making to the appropriate stakeholders when appropriate.
- Serves as a point of expertise on Research Data governance and recommending data governance solutions, working with key stakeholders as appropriate.
- Maintains the Research Data Governance Committee agenda and convenes meetings.
- Identifies and includes key decision makers in matters as appropriate.
- Develops and maintains a central repository for Research Data governance policies, guiding principles, and decisions.
- Oversees the maintenance of records and documentation about Research Data governance, including an inventory for highly sensitive (level 4) data, working with other key stakeholders (such as VUIT, OGC, Internal Audit, and other groups as required).

Research Data Governors

Deans will appoint Research Data Governors who are accountable for the implementation of Research Data governance policy in their colleges or schools. Research Data Governors will normally be a senior leader or administrator (such as an Associate Dean of Research) in a college or school. Research Data Governors work with Research Data Investigators to administer and implement applicable Research Data governance policies for the colleges or schools in which they are accountable.

In addition, Research Data Governors also:
- Foster a culture and training regime that is aware of the Research Data governance principles, including the data usage agreements, the disclosure

process, and security controls.
- Sponsor, secure, and/or influence resources for managing research data
- Set expectations for managing data in their schools or colleges, such as Research Data Classification and Research Data Retention.
- Making decisions about their schools or colleges where standard guidelines are ambiguous or do not apply.
- Approve annual attestations from faculty and/or researchers at Vanderbilt designed to ensure that they are familiar with institutional Research Data governance polices in general, data usage requirements (such as data usage agreements, data classification policies, etc.) that are specific to their research efforts, and they are cognizant of how their research collaborators (such as graduate students, post-docs, undergraduate researchers, etc.) are aware of—and abide by—the relevant data usage requirements.

Research Data Investigators

The Research Data practices of Research Data Investigators are overseen and approved by Research Data Governors. Research Data Investigators are typically faculty and/or researchers at Vanderbilt. There will be many Research Data Investigators within a school or college. They have day-to-day responsibility for conducting research and implementing Research Data governance in their data system or scholarly area. Research Data Investigators are subject matter experts in their research disciplines and work closely with Research Data Governors and their sponsors to make decisions on how to apply Research Data governance policy and principles in different situations.

Key responsibilities of Research Data Investigators include:
- Developing systematic operating procedures to comply with Research Data governance policy and principles.
- Work with VUIT's Information Security team to ensure that system controls are in place to flag suspicious activities or potential data breach.
- Communicate and train personnel (such as graduate students, post-docs, research scientists, undergraduate researchers, external collaborators, etc.) on Research Data governance policies and procedures and the implications for their activities.
- Identify Research Data integrity and quality issues and develop plans to address.
- Periodically review their Research Data access and usage agreements to ensure appropriate access is maintained.

Research Data Retention

Vanderbilt requires that all Research Data relevant to sponsored research be retained for a minimum of three years following the completion of the sponsored project/expiration of the agreement with the funding source. In addition, any Research Data derived from projects involving post-docs or students must be retained until completion of the student's program or the post-docs' employment at Vanderbilt or until it becomes clear the student or post-doc has abandoned the project from which the Research Data is derived. Finally, any data relevant to a disclosure to the Office of Technology Transfer, in particular written records of early ideas or experiments, should be retained to support possible patent prosecution (up to 20 years from the initial disclosure to the Office of Technology Transfer). Beyond these retention periods, the retention or destruction of the research record is at the discretion of the PI.

Transfer of Research Data to another Institution

Ownership of Research Data belonging to Vanderbilt may be transferred to another institution when a PI moves to that institution with the approval of the Vice Provost for Research or his/her designee and with written agreement from the PI's new institution that guarantees (1) its acceptance of custodial responsibilities for the data and (2) that Vanderbilt may access the data should it become necessary.

RELATED POLICIES/DOCUMENTS

Vanderbilt Policies
- o Electronic Communications and Information Technology Resources
  - ▪ Policy #HR-025 (http://hr.vanderbilt.edu/policies/HR-025.php)
- o Vanderbilt Computing Privileges and Responsibilities – Acceptable Use Policy
  - ▪ http://www.vanderbilt.edu/info/computing-aup/
- o Vanderbilt Data Classification Policy
- o Vanderbilt Institutional Data Governance Policy

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Comment

Disclaimer: Vanderbilt reserves the right to modify its policies and practices, in whole or in part, at any time. Revisions to existing policies and procedures, and the development of new policies and procedures, will be made from time to time at the discretion of the University. When new policies are implemented or existing policies are revised, the University will notify members of the University community as soon as practicable. However, where differences occur, the most recent policy as reviewed and approved by the University will take precedence.

Procedures Website

FAQ Website