



## UWM RESEARCH DATA MANAGEMENT POLICY

No: 14-9

Date: February 2025

**Authority:** 2 C.F.R. 200, Subpart D, Record Retention and Access

**Initiator:** Vice Provost for Research, Office of Research

**Responsible Party:** Vice Provost for Research, Office of Research

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### I. Purpose

The purpose of this policy is to provide a general framework and expectations around research data and its stewardship, retention, accessibility, and security. In addition, this policy provides guidance on matters of research data transfer.

### II. Definitions

**Research:** A systematic investigation, including research development, testing, and evaluation, designed to develop or contribute to a fuller scientific knowledge or understanding of the subject studied, and for the purposes of this policy, the systematic use of knowledge and understanding gained from research directed toward the production of useful materials, devices, systems, or methods, including the design and development of prototypes and processes.

**Research Data:** Records of research that are necessary for the reconstruction and evaluation of research results and the events and processes leading to those results, regardless of the form of the media on which they are recorded. For example, data may include writings, film/videos, sound recordings, pictorial reproductions, drawings, designs, or other graphic representations, procedural manuals, forms, diagrams, workflow charts, equipment descriptions, data files, statistical records, and other research data. This definition pertains to both primary and secondary data. Details related to what information or material might constitute research data will depend on the specific federal regulations, sponsor requirements, and field of study applicable to a given research project.

**Research Data Management:** All actions contributing to the collection, organization, documentation, analysis, integrity, accuracy, security, retention, preservation, and sharing of research data.

**Researcher:** Any individual who creates, accesses, processes, enters, reads, deletes or otherwise uses research data including faculty, students, and staff.

**Principal Investigator (PI):** Lead or principal researcher on a given project.

**Retention Period:** The length of time research data must be retained following the dissemination of knowledge from research, the completion of a study, or the conclusion of a sponsored research agreement.

### **III. Scope**

This policy applies to all faculty, staff, students, and other persons involved in the design, conduct, or reporting of research at the University of Wisconsin-Milwaukee (UWM) or at facilities under the auspices of UWM, as well as the research data generated under the purview of UWM or with university resources.

This policy describes the general expectations for UWM research data management. This policy does not supersede more restrictive research data management expectations of particular grants by federal agencies, other parties, or sponsors. Data exclusively related to teaching activities is generally excluded under this policy.

### **IV. Policy Statement**

In compliance with applicable agreements, policies, regulations, and relevant federal and state laws, UWM research data shall be appropriately maintained in sufficient detail for an adequate period of time to meet the stewardship, retention, accessibility, and security expectations of external agencies and to facilitate the review and verification of research results.

### **V. Roles and Responsibilities**

- The Principal Investigator (PI) is responsible for the stewardship and retention of research data and for initial determinations concerning access to and appropriate use of data.
- Other research contributors are responsible for cooperating with the PI in carrying out the requirements of this policy.
- The Dean of the college in which the PI is appointed will consider and provide written responses to appeals concerning issues of access to data and appropriate use of data.
- The Vice Provost for Research (VPR) will consider appeals to a Dean's determination concerning access to data and appropriate use of data. If the VPR reaches a different conclusion from the Dean, the VPR's decision is final and cannot be further appealed.

### **VI. Stewardship**

The PI is responsible for the collection and management of research data and is ultimately responsible for following best practices for managing research data. PIs must identify the research data management requirements for their projects and maintain an orderly system of data security, access, and retention according to applicable rules, regulations, policies, and/or contractual agreements.

If the PI leaves UWM prior to the end of the required data retention period, it is the responsibility of the PI's Dean to identify or designate ongoing stewardship responsibility.

If a project does not have a named PI, the responsibilities for research data stewardship will rest with the Dean or their designee.

### **VII. Retention**

Research data retention requirements can vary based on regulations, contractual agreements, funder, sponsor, publisher rules, or other UWM policies. It is the responsibility of the PI to

determine the research data that needs to be retained under this policy and any other applicable rules, regulations, policies and/or contractual agreements.

If an obligatory retention period is not specified by another authority, UWM research data should be retained for a minimum of 4 years following the conclusion of a project, with the original data retained wherever possible.

Research data must be retained on the UWM campus, or in facilities or services under the control of or contracted by UWM, unless specific permission to do otherwise is granted by the VPR. Research data will typically be retained in the unit where it was produced.

## **VIII. Access**

PIs are responsible for managing contributors' access to research data and for meeting the data access and use requirements of sponsoring agencies. A basic expectation of this policy, however, is that each member of a research team should have reasonable access to the data and materials resulting from their work, unless otherwise previously agreed in writing.

UWM maintains the right to access all research data as specified in this policy, irrespective of whether any agreement includes specific provision for such access. The PI, upon request from their Dean, the VPR, the Public Records Custodian, or other responsible university official, must provide access to the relevant research data. Under extraordinary circumstances, such as in cases of research integrity or compliance concerns, the university will take necessary steps to safeguard the integrity of and access to data.

None of these access provisions are intended to supersede a PI's right to keep data proprietary until the results of the research have been published and the aims of the research have been fulfilled.

## **IX. Research Data Transfer**

When researchers leave UWM or move to a different research group or position at UWM, they may take copies of the research data they have generated or to which they have made a substantial contribution, unless in conflict with other applicable rules, regulations, policies, and/or contractual agreements. Original data, however, should be retained at UWM by the PI.

If a PI leaves UWM, and a project is to be moved to another institution, the data may be transferred with the approval of the VPR and with written agreement from the PI's new institution.

Research data that includes human subjects' data, controlled, restricted, or confidential information may not be transferred outside UWM without appropriate compliance review and written approval by the VPR.

## **X. Security**

UWM research data shall be maintained, classified, and protected according to UW System Regent Policy Document 25-5 and Administrative Policy 1031.

Research data that includes confidential information, proprietary information, controlled unclassified information (commonly referred to as "CUI"), or export-controlled information, requires consideration of additional security protections. It is the responsibility of the PI to identify the classification of their research data and to provide appropriate protections in

accordance with applicable rules, laws, regulations, policies, and/or contractual agreements.

**XI. Interpretation of Policy**

Questions on the interpretation of this policy may be directed to the VPR/Office of Research.

**XII. Contact Information**

Office of Research

## APPENDIX A: REFERENCED OR RELATED POLICIES

UWM Policy on Research Misconduct 14-5

UWM Export Controls in Research Policy 14-3

UWM IRB Data Storage Guidelines

UW System Administrative Policy 342

UW System Regent Policy Document 25-5

[UW System Administrative Policy 1310](#)

UW System Administrative Policy 1315

UW System Administrative Policy 1031

UW System Administrative Policy 1033

[UW System Research Project Records UWRSC035](#)

2 C.F.R. 200, Subpart D, Record Retention and Access, §§ 200.334 – 200.338