Harvard Policy For Data
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Data Management

Why is it important?

- New and advanced instrumentation, social media, electronic transactions, automated learning and other advances in research are generating huge amounts of data.
- Data management and sharing plans are now requirements for funding agencies (e.g. NIH, NSF).
- See: NIH Public Access Policy
- Association of Research Libraries Public Access Policies
- University Open-Access Resources:
  - [http://cyber.law.harvard.edu/hoap/Good_practices_for_university_open-access_policies](http://cyber.law.harvard.edu/hoap/Good_practices_for_university_open-access_policies)
  - [http://libraries.mit.edu/scholarly/mit-open-access/open-access-at-mit/mit-open-access-policy/mit-faculty-open-access-policy-faq/](http://libraries.mit.edu/scholarly/mit-open-access/open-access-at-mit/mit-open-access-policy/mit-faculty-open-access-policy-faq/)
  - [http://osc.universityofcalifornia.edu/open-access-policy/policy-faq/](http://osc.universityofcalifornia.edu/open-access-policy/policy-faq/)
- Good data is critical for validation of research results. Many journals now require that original data be submitted with manuscripts.
- Federal and local government regulations require protection of sensitive data.

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Harvard’s Approach

• Harvard is highly decentralized
• Many offices at school and central level have a role in the complex world of data management
• The office of Vice Provost for Research is responsible for coordination of research related policies
• To help the faculty, Harvard has developed a number of policies relating to ownership, management, retention and disposal of research data
• These policies and guidelines are developed in collaboration with the HU Information Technology, Office of Sponsored Programs, faculty representatives, Office of General Council, Harvard Library, and the University Archives
Who Owns the Data?

*IP Policy*

- All data is governed by Harvard’s IP Policy as approved by the President and Fellows
- The IP policy addresses the ownership and disposition of intellectual property.
- Includes inventions, copyrights (including computer software), trademarks, and tangible research property such as biological materials.
- The policy assigns ownership to the University if the invention was created through substantial use of University resources.
How is Data Managed?

Research Policies

• The OVPR has developed a number of guidelines for the schools based on the principle that the University and its researchers are accountable for:
  – Ensuring the integrity of and access to research data and materials
  – Information that relates to the administration and financial management of research
  – Reporting of research results, sponsored award applications, and human research records

• The key elements of the policies include:
  – Definitions of what data elements are covered
  – Guidance for record retention
  – Data security review and classification for sensitive data such as human subject identifiers
  – Annual reporting to Chief Compliance Officer by the schools

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How is Data Managed?

*IT Policies*

HUIT has also developed university-wide policies, including:

- Policy on Access to Electronic Information that provides guidance for the University’s access to user electronic information that is stored in or transmitted through any University system.

- Information Security Policy that is applicable to data from teaching, research, and the University’s business operations. The policy has a subset specifically relating to human subjects data.

- HUIT is moving more and more to contractual Cloud Services with e.g. Amazon Web Services (AWS) to assist with secure data storage.
Resources for the Researchers

The OVPR:

- Acts as resource for the researchers for management of human subject data
- Has also developed an electronic system known as Acquired Data Management and Accountability System (ADAMS) for assisting the researchers with the management of data use contracts and data security worksheets. The system is being rolled out across the university and will streamline processes across the Harvard
- In collaboration with Harvard Catalyst has also developed toolkits for data management and protection practices, and training programs for researchers
Conclusion

• Research data management is a complex regulatory mandate and one with which all of our peers are struggling
• The University has developed a wide range of policies, guidelines and services for data management, but more work is to be done
• The OVPR, working closely with HUIT, helps to coordinate these activities to ensure that there is consistency across the institution
• Many of the operational aspects are delegated to the schools’ IT offices