



## Policy: Responsible Data Storage

---

Creators: Laura Justice, Shayne Piasta, Jason Flowers, Bobbie Bowling, Elaine Joy

Last updated: May 31, 2016

Questions on this policy should be directed to: Jason Flowers

---

A policy regarding the responsible storage of research data is needed to ensure that the Crane Center for Early Childhood Research and Policy (CCEC) is in compliance with the university's Institutional Review Board and federal regulations governing responsible data practices. In addition, this policy will help to provide both physical and digital storage space for new and ongoing research projects in the CCEC and allow principal investigators and project directors to maintain access to project data.

- I. All identifiable data collected through the CCEC are to be "double-locked." In other words, physical data must be kept in a locked filing cabinet, behind a locked front door and digital data must be maintained on a password-protected device, behind a locked front door.
- II. Research projects conducted through the Crane Center for Early Childhood Research and Policy are to digitize data whenever possible. Each Principal Investigator should include the purchase of external hard drives for cold storage of digital data in their project budgets. Please contact the CCEC Tech Team to discuss available options and pricing.
- III. The CCEC has very limited space dedicated to storage of physical data. Priority for storage of physical data is allocated to projects that are ongoing. For these purposes, an ongoing project is one that is still being funded or is actively collecting and processing data.
- IV. Whenever possible, physical data should be stored in standard banker boxes provided by the CCEC and labelled using a standard template provided by the Operations Team. Labels should include: Project name; federal award number (if applicable); OSU project number; principal investigator's name; project end date; destroy date; and description of contents.
- V. **The CCEC will store physical or digital data (including unused test forms) for inactive projects for a period of 5 years. For our purposes, a project is inactive when its funding has ended or that project is no longer actively collecting or processing data or that project's publishable database has been archived.**
- VI. **Six months before** a project's funding has ended *or* that project is no longer actively collecting or processing data *or* that project's publishable database has been archived, the principal investigator will contact the CCEC Tech Team to initiate the transfer of its digital data to cold storage.
- VII. At that time, the project director will provide the CCEC Tech Team with their password-protected hard drive. All digitized data (including, but not limited to: scans, hand-entered data,



and video/audio data) will be removed from the network drive by the tech team, and transferred to the password protected hard drive.

- VIII. **After 5 years have elapsed since the project became inactive, the CCEC will contact the principal investigator and the principal investigator will then assume full responsibility for storing that hard drive and all physical data pertaining to their project, including unused test forms.**
- IX. **The CCEC strongly recommends that principal investigators destroy all research data after 5 years following the completion of the research project.**
- X. When an investigator leaves the Ohio State University, the CCEC recommends that the investigator meet with the CCEC Executive Director to ensure that he or she is compliant with OSU's Office of Research Compliance policies regarding Research Data. This policy can be found on the Office of Research website, and is also included below:
- a. "In general, when the principal or co-investigators involved in research projects at Ohio State leave the university, they may take copies of research data for projects on which they have worked. As required by academic practice, the use of such data (for example, to conduct additional research, or for presentation or publication) is dependent on the agreement with the PI, or as may be formally agreed-upon beforehand by the PI and other co-investigators in a data use agreement. In all cases, the PI must retain the primary research data at the university. If a PI leaves the university or a project is moved to another institution, the primary research data may be transferred according to the procedure described below:
    - i. If a PI leaves the university or a project is moved to another institution, the primary research data may be transferred with the approval of the dean of the college employing the PI, the Vice President for Research and the Health System (for data that incorporates patient information with personal identifiers), and with written agreement from the new institution, which, at a minimum, shall provide:
      - 1) Adoption by the new institution of all custodial responsibilities for the data, including acceptance of all Ohio State University and federal security requirements for restricted data that is transferred;
      - 2) Formal recognition of Ohio State University's continued ownership of the data by the new institution; and
      - 3) Guaranteed access by Ohio State University to the primary data, should such access become necessary."