

Policy 2208

Research Data

Date of Current Revision: April 2026

Responsible Officer: Vice President for Research, Economic Development and Innovation;
Director of Information Technology Policy and Compliance

Secondary Officer: Provost and Vice President of Academic Affairs

1. PURPOSE

This policy assures that research data are appropriately recorded and archived, and available for access and review under appropriate circumstances.

2. AUTHORITY

The Board of Visitors has been authorized by the Commonwealth of Virginia to govern James Madison University. See Code of Virginia § 23.1-1600; § 23.1-1301. The board has delegated the authority to manage the university to the president.

STATE OR FEDERAL STATUTE AND/OR REGULATION

1. OMB Circular A-110

3. DEFINITIONS

Principal Investigator (PI)

The individual with the responsibility for conducting the research or other activity described in a proposal for an award. The terms “principal investigator” or “project director” may be used interchangeably in accordance with the agency’s program language. The PI is defined as all persons who contribute significantly to the design and implementation of a study protocol. PIs do not participate in the research as participants.

Research Data

The recorded factual material commonly accepted in the scientific community as necessary to validate research findings.

May include, but is not limited to, technical information, laboratory and other notebooks, worksheets, evaluations, protocols, statistics, samples, diverse media, physical collections, compositions, biologics, materials, images, illustrations, drawings, prototypes, and equipment.

Examples of research data include, but are not limited to:

- Records necessary for the reconstruction and evaluation of the results of research;
- Data contained in laboratory notebooks;
- Data collected using instrumentation or systems and stored in an electronic format; and
- Case report forms and source documentation for human and/or animal subject research studies.

4. APPLICABILITY

This policy applies to all faculty, staff (includes postdoctoral researchers), and students involved in the design, conduct, or reporting of research using university resources or facilities other than those typically used for academic instruction.

5. POLICY

Individual researchers and the university have rights and responsibilities with respect to research data. This policy describes the basis of data ownership and the standards for data management, in addition to requirements for data access. This policy also provides guidance with respect to transfer of research data in the event a researcher leaves the university.

6. PROCEDURES

6.1 Research Data Management

- a. Responsibility for research data management through a sound research data management plan lies primarily with Principal Investigators (PIs) of any research project or program. Research data management plans should ensure that research data are available for access and re-use where appropriate and under appropriate safeguards.
- b. Research data will be managed throughout the research data lifecycle as part of the university's commitment to research excellence.
- c. The university, primarily via the Libraries, will provide training, support, advice and (where appropriate) guidelines and templates for research data management and research data management plans.
- d. All research data shall be preserved in the custody of, or as arranged by, the PI on behalf of the university.
- e. As described in "Responsibilities," mechanisms and services for storage, backup, registration, deposit, description, access and retention of research data assets in support of current and future access requirements, during and after completion of research projects, will be made available to PIs.
- f. The university will not necessarily support costs, where they exist, associated with public access requirements from funding agencies. Those costs should be derived from those funding agencies.
- g. REDI, in consultation with Information Technology and the Libraries, will develop appropriate guidelines for placing research data outside the university. The university supports the practice of placing research data in multiple locations both within and outside of the institution, as per data management practices.
- h. PIs should consider placing research data of future historical interest, and data that substantiate research findings, in an appropriate university, disciplinary or governmental repository.
- i. Access to research data for later re-use is encouraged under this policy. Exclusive rights to reuse or publish research data will not be assigned to commercial publishers or other agents, unless this is a condition of funding or a result of university policy or licensing choices.

6.2 Research Data Ownership

- a. The university retains rights, title or interest in all research data created or developed in facilities operated or controlled by the university, supported by funds administered by the university, and performed in the course of regular duties by all members of the university workforce.
- b. Data produced through a collaboration between a university PI and a non-university third-party must have a memorandum of understanding (MOU) regarding ownership and portability of the data established prior to data collection.
- c. The dean and the vice president for research, economic development, and innovation may negotiate a transfer agreement with the researcher to ensure access to the data by all parties, depending on the circumstances of separation from the university.

- d. If the PI leaves the university, and a project is to be moved to another institution, ownership of the original data may be transferred to the PI's new institution upon request from the PI, subject to:
 1. the prior written approval of the Dean and the Vice President for Research, Economic Development, and Innovation;
 2. written agreement from the PI's new institution that guarantees (1) its acceptance of ongoing custodial responsibilities for the data and (2) James Madison University having access to the original data, should such access become necessary for any reason; and relevant confidentiality restrictions, where appropriate.
- e. The legal interests of the subjects of research data must be protected and considered in any transfer of data within or outside the university.

7. RESPONSIBILITIES

All departments, offices and employees that generate, receive, or maintain public records under the terms of this policy are also responsible for compliance with Policy [1109](#) – Records Management.

7.1 Office of the Vice President for Research, Economic Development and Innovation

- a. Fosters an environment that promotes the wide dissemination of research data in furtherance of the university's mission.
- b. Ensures that research data management needs and regulatory obligations, including preservation and accessibility, are met for research data, and operational considerations with respect to the various types of research data captured.
- c. Determines future research data management requirements in conjunction with JMU Information Technology and JMU Libraries.
- d. Coordinates response to charges, audits, claims, or litigation regarding research, such as allegations of scientific misconduct, non-compliance or fraud or abuse.

7.2 JMU Information Technology

- a. Directs the information technology strategy for the university, which may include strategy for research data storage, archiving, and information security in concert with JMU Libraries, and addresses the information technology needs of the university, including the needs of research data storage.
- b. Determines future research data management requirements in conjunction with the Office of the Vice President for Research, Economic Development and Innovation and JMU Libraries.

7.3 JMU Libraries

- a. Coordinates and advises on the long-term preservation, access, and curation of research data to meet federal, state, sponsor, and university requirements.
- b. Provides support and training services for researchers in the creation and implementation of data management plans and best practices in data management and data sharing.
- c. Determines future research data management requirements in conjunction with JMU Information Technology and the Office of Vice President for Research, Economic Development and Innovation.

7.4 Office of University Counsel

Advises the university regarding research data sharing and compliance with state and federal regulations, sponsor requirements, and university policies to ensure that research data sharing practices do not conflict with other university policies or interests.

7.5 Principal Investigator

- a. Acts as the custodian of the research data.
- b. Determines what research data needs to be retained (according to sponsor requirements, if funded research) and no less than six years in sufficient detail.
- c. Manages access to research data.
- d. Selects the vehicle for publication or presentation of the research data.
- e. Shares research data, including placing research data in public repositories pursuant to university policy, unless specific terms of sponsorship or other agreements supersede these rights.
- f. Ensures that research data under their stewardship are preserved.
- g. Educates all Personnel in the research project about their obligations regarding research data.
- h. Consults the Office of Research Integrity to ensure the research data is protected and shared appropriately.

7.6 Dean

- a. Identifies a new custodian for the research data when a principal investigator leaves JMU.
- b. Grants permission to take copies of the research data to principal investigators leaving JMU, in consultation with the Office of the Vice President for Research, Economic Development and Innovation.

8. SANCTIONS

Sanctions will be commensurate with the severity and/or frequency of the offense and may include termination of employment.

9. EXCLUSIONS

None.

10. INTERPRETATION

The authority to interpret this policy rests with the president and is generally delegated to the vice president for research, economic development and innovation.

Responsible Executive

Vice President of Administration and Finance

Previous version: NA

Approved by the president: April 2026