

University Policy: Policy on Academic Requests for Restricted Use Datasets for Research

Policy Category: Academic Policies, Operational Policies

Subject: The request for and approval of access to restricted use data sets for faculty research or, if a student is conducting the research, the faculty sponsor.

Office Responsible for Review of this Policy: The Office of the Provost: Vice Provost for Graduate Studies and Research

Procedures: Procedural guidance will be provided on a case-by-case basis by the Vice Provost for Graduate Studies and Research

Related University Policies: N/A

I. SCOPE

This policy addresses the process for obtaining University approval for the use of restricted use datasets for academic research.

II. POLICY STATEMENT

The purpose of this policy is to ensure that American University complies with the various requirements that come with the use of restricted use datasets for research. Different types of data have different compliance requirements and to ensure proper oversight all requests for restricted use datasets for research must be handled in a standard way.

III. DEFINITIONS

Restricted use datasets: Data from third parties which can only be obtained by committing American University to comply with predetermined restrictions.

IV. POLICY

All requests for access to restricted use datasets must be coordinated and approved by the Vice Provost for Graduate Studies and Research. The review and approval shall:

- Evaluate the requirements imposed by the restricted use dataset.
- Determine if current capabilities and resources can meet them.
- Coordinate the provisioning of technology and process to satisfy the requirements.
- Obtain technology risk advice from the Office of the CISO.

- Assure that any compliance agreements concerning the use of restricted use datasets are signed by a specific representative of the university with signatory authority, the Vice Provost for Graduate Studies and Research.
- Implement a plan to assure that the compliance agreements are adhered to.
- Maintain a list of all restricted use datasets agreements.
- Assure that datasets are returned to the vendor according to terms of the agreement.

All requests for access to restricted use datasets must be initiated by the faculty member requesting the data or the student conducting the research and the faculty sponsor. Review and approval may involve consultation with the following offices: Research Compliance Manager in the Office of the Vice Provost for Graduate Studies and Research; the Center for Teaching, Research and Learning; the Office of General Counsel; and the Office of the Chief Information Security Officer (CISO) in the Office of Information Technology.

V. SIGNATURE, TITLE AND DATE OF APPROVAL

This policy must be signed by the appropriate officer (listed below) before it is considered approved.

Approved: Scott Bass, March 15, 2011