Best Practice for Affirming Protection of Contractually Protected Research Data

Researchers at Harvard obtain data from external sources for research purpose. Some sources require a University signature on an agreement to protect the data. *In these cases, a researcher cannot sign such an agreement. The signature must be from the Office of Sponsored Programs (OSP) regardless of funding considerations.*

The following process should be observed to ensure that the data is properly protected before OSP signs the agreement.

1. The researcher describes the data and attaches a copy of any required protections described by the data source.
2. The researcher must document the special protections that will be employed to keep the data secure. These protections must be in accord with the protections required by the data source.
3. The form for documenting the data protections may be found at [http://www.security.harvard.edu/resources/forms](http://www.security.harvard.edu/resources/forms)
4. The researcher forwards the request to the School CIO or School security officer and the Institutional Review Board (IRB) for the area, or if in Central Administration, to the University Technology Security Officer.
5. The School CIO will review and work with the researcher to obtain additional information or to clarify the request if needed, and to ensure that the right protections are employed.
6. Where necessary the School CIO will consult with the IRB to clarify the type of data and protection required.
7. When the School CIO is satisfied that the protections meet requirements of the external source, the CIO will forward the agreement to OSP with a cover note indicating approval and advising OSP that it is acceptable to sign the agreement.
8. The IRB may request confirmation from the researcher that the CIO review process has been satisfactorily completed.