

**Data Custodian and Regulatory Guidance Standard Operating Procedure
ESFCOM Office of Research**

In order to comply with WSU Executive Policy #8, PIs must identify a Data Custodian and Secondary Access Person for the data obtained as part of a human subjects research study. The WSU IRB Non-Exempt Application form requires this information under section 4.3.D of the application (Figure 1, below). To satisfy this requirement the ESFCOM Office of Research suggests the following:

- 1- The PI of the project should be listed as the Data Custodian

- 2- The Secondary Access Person should be listed as the ESFCOM Area Technology Officer (ATO), Erika Fleck
 - a. Erika Fleck or the ESFCOM ATO should be listed as study personnel in the personnel section of the application, section 1.3.
 - b. Chanel Brown, ESFCOM Compliance Liaison, should also be listed in the study personnel section. She supports the ATO in their position as Secondary Access Person.
 - c. Both the above elements (a & b) are required if using the ATO as your Secondary Access Person.
 - d. Please contact IT if you prefer to list someone other than recommended.

- 3- Additionally, ESFCOM Compliance liaison Chanel Brown is available to assist the PI with the following, and can be contacted at chanel.brown@wsu.edu
 - a. Support in the review process of a human subjects research study
 - b. Communicate with the IRB on behalf of the PI
 - c. Screen application forms prior to review
 - d. Make recommendations regarding ethical recruitment and consent strategies
 - e. Make recommendations for effective correspondence with reviewers

Figure 1. Sample Text from Current IRB Application.

D. Data Administration

Complete the following as per the guidelines in WSU's Executive Policy #8.

<https://policies.wsu.edu/prf/documents/2017/06/ep8-university-data-policies.pdf/> . Include responsible parties name, title, WSU affiliation, and contact information:

Secondary Access Person:

Data Custodian: If your college or department does not have anyone identified as Data Custodian, the Primary Investigator (PI) can act as the Data Custodian for the systems and data they are responsible for. However, the PI should consult with their Area Technology Officer or their IT department on how to comply with applicable information security and privacy requirements.

Data Custodian responsibilities are listed in WSU's Executive Policy #8.

<https://policies.wsu.edu/prf/documents/2017/06/ep8-university-data-policies.pdf/>