# Processing and Securing Research Data



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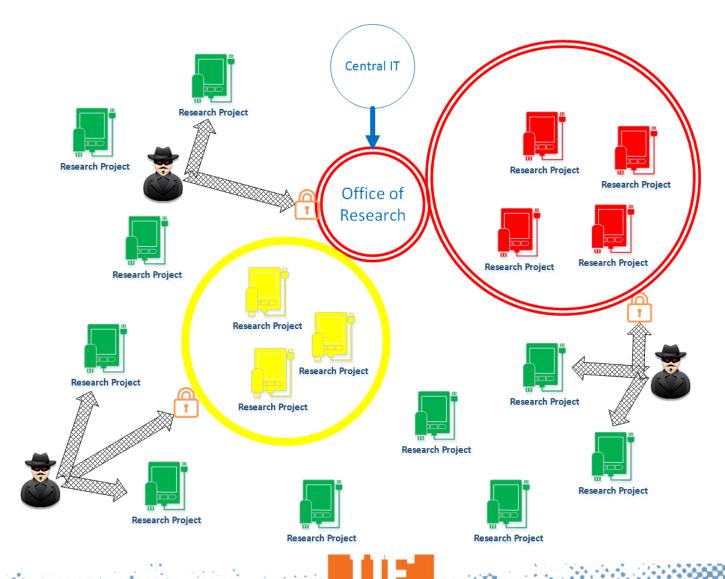
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A Carton

## Framing the Problem



# Role of College Research Administrators

- Office of Research deals with contracts
- Research Computing operates compliant infrastructures
  - But some workflows have parts that must be outside the compliant infrastructure
- College Research Administrators facilitate processes
  - Be aware of potential restrictions in RFP/BAAs
  - Be aware of faculty in your departments who process secure research
  - Prepare proposal budgets to handle IT security costs
  - Be aware of contract restrictions
  - Protect data received and marked as controlled
  - Understand controls in approved projects

## Regulations

Acronym	Regulation Title	Covers
ITAR	International Traffic in Arms (22 CFR 120- 130)	Controls export and import of defense-related articles/services on the United States Munitions List (USML)
EAR	Export Administration Regulations (15 CFR 300-799)	Controls export and release of dual-use items listed on the Commerce Control List (CCL)
FISMA 2002 & FISMA 2014	Federal Information Security Management (Modernization) Act	Requires consistent standards to protect federal information and federal information systems
DFAR 252.204-7012	Safeguarding of Unclassified Controlled Technical Information	Required safeguards for Covered Defense Information (CDI) and Cyber Incident Reporting; NIST 800-171 applies; Safeguards required by Dec 2017
FAR 52.204-21	Basic Safeguarding of Contractor Information Systems	Required safeguards for information systems owned or operated by a contractor that processes, stores, or transmits federal information
32 CFR 2002	Controlled Unclassified Information	Required safeguards for federal information & systems: describes, defines, and provides guidance on the minimum protections for CUI



## **Export Controlled Projects**

- <u>Fundamental Research</u> Research in science, engineering, or mathematics, the results of which are intended to be published and shared broadly with the academic community (15 CR 734.8)
- Fundamental Research can still involve export controlled technology or produce export controlled physical items.
- Controlled research is research which includes publication/dissemination restrictions or nationality restrictions.
- Controlled Research or items result in a TCP.

# **Determining Controls**

- Statements of control in contracts
  - Publication Restrictions
  - Nationality Restrictions
  - Determinations of Jurisdictions
  - Distribution Statements
- Export Control Reform
- ITAR US persons only without license
- EAR country specific for release based on CCL
- Additional contractual restrictions

# Technology Control Plans (TCP)

- Institutional Commitment
- Scope of Work
- Contractual Restrictions
- Jurisdiction and Classification Determination

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- Physical Security
- Information Technology Security
- Project Personnel
- Certifications

## Initial Data Considerations

**Q1:** Is the PI collecting, storing, processing, analyzing, maintaining, or transporting any of the following data types?

**Q2:** What is the approximate total number of records in the dataset(s) that contain sensitive, restricted or regulated information?

**Q3:** There are many activities related to data that could introduce potential threats or risk to your research project and the institution. Several examples of data activities include:

- Primary data collection
- Secondary data analysis (e.g. merging data from existing datasets)
- Data transport to or from UF
- Data storage

Considering all activities related to the data, what are all the methods by which PI will collect, analyze, transmit or store data?

# Data Categorization

- DRCGS will determine if EAR or ITAR in conjunction with PI and contract clauses.
- Is Controlled Unclassified Information involved, if so NIST 800-171.
- Based on rules, what technical solutions are available?
  - ResVault
  - ResShield
- What does the PI and research team have to do?
  - Complete training & Rules of Behavior
  - Analyze data in the approved technical solutions
  - Follow data custodian chain of command

# **Controlled Computing Environments**

Restricted data is defined as data that is governed by laws, regulations, and/or contractual agreements (see the **UF Data Classification Policy**). To support research that involves restricted data, UF operates a Computing Environment for Restricted Data (CERD) to meet certain obligations to laws and contractual agreements. The details of UF's FISMA Program are described in the **CERD Handbook** and **specification of compliance and disclaimer**.



#### ResearchVault



#### ResearchShield

Computing Environment for Restricted Data (CERD) that is NIST 800-53 moderate and 800-171 compliant as of December 2017. Computing Environment for Restricted Data (CERD) that is NIST 800-53 moderate as of November 2015. It will be CMS ARS 3.1 compliant by June 2018.

The **rates** for using the compliant environments for research with restricted data is calculated by counting computing and storage capacity.

https://www.rc.ufl.edu/services/restricted-data/



### **Other Controlled Data**

### Other restricted data

- FERPA student data
- HIPAA HITECH patient data PHI patient health information
- PII personal identifiable information
- IP intellectual property is sensitive and is allowed on HiPerGator, but if you seek more controls then ResVault will provide that extra assurance e.g. to a pharmaceutical company funding the project

### **HIPERGATOR**



https://www.rc.ufl.edu/services/hipergator/

# **Budgeting for Data Services**

### **HiPer Gator Pricing**

- Orange storage \$25/TB/year
- Blue storage \$140/TB/yr
- CPU \$44/NCU/yr
- GPU \$260/NGU/yr
- Tape backup \$78/TB/yr

### **ResVault Pricing**

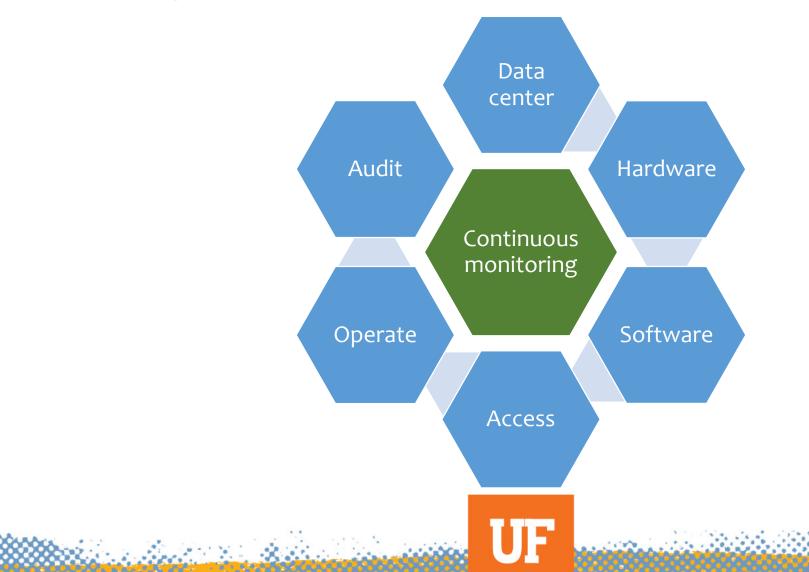
- Replicated & backed-up storage \$220/TB/yr
- CPU for secure VM \$90/RNCU/yr
- GPU for secure VM \$260/RNGU/yr

Tips: Buying 5-year-life hardware can be cheaper Find details at the Price Sheets under Services on the RC website <u>https://www.rc.ufl.edu/services/rates/</u>

### Individualized IT solutions

- General approach: leverage ResVault and add minimal extension
  - Example: a compute in a lab to test a circuit board and collect data, with the design and the data kept and processed in ResVault
- Exceptional needs for a complete system outside of ResVault because ResVault does not meet requirements
  - This takes (a lot) of time (3 to 6 months) and effort (several FTE)
  - Full Archer security review, all 260+ controls
  - Build system and implement all business processes to meet all 260+ controls
  - Pricing can be extensive and difficult to plan in advance

### Security Controls and Continuous Monitoring



### **Additional Resources**

- Research Computing Website: <a href="https://www.rc.ufl.edu/">https://www.rc.ufl.edu/</a>
- Division of Research Compliance and Global Support Website: https://research.ufl.edu/compliance.html

### Reach out to us, we're here to help:

Division of Research Compliance & Global Support exportcontrol@research.ufl.edu Phone: 352-392-9174 Research Computing Services Request Support Link https://www.rc.ufl.edu/help/s upport-requests/

