



Memorandum To: Principal Investigators, Research Staff, and Research Administrators
From: Mass General Brigham Research Leadership¹ **Date:** 7/12/21
Subject: *Travel Reminder:* Transporting electronic research data and materials

With relaxation of travel restrictions, we anticipate that MGB researchers will resume traveling shortly, and MGB postdoctoral fellows and visitors will soon be entering/exiting the US on a routine basis. To ensure smooth travels, we are writing to remind you of MGB requirements for transporting research biological materials and electronic research data.

Research materials and data generated at an MGB institution are owned by the institution and subject to MGB policies. Research travel in general is subject to MGB travel policies and, in the post-Covid era, state, local, federal, and CDC requirements. Travelers should familiarize themselves with MGB, airline, and destination policies before departure.

Biological Materials

- Materials may not be shipped from an MGB institution to another institution without authorization, typically a fully executed Material Transfer Agreement (MTA).
- With the exception of a carve-out for pathology slides, researchers are prohibited from personally transporting materials in checked luggage, carry-on luggage, or elsewhere on their person. See the policy at the link below for full details on pathology exception.
- Materials must be shipped via a common carrier (i.e., Federal Express, DHL, or USPS) and packaged in accordance with IATA requirements by individuals who have completed training and are IATA certified.
- If the recipient institution is located outside of the US, an export control review may be necessary before materials can be shared, in addition to an export permit.
- There is an optional, short (no more than 15 minutes) HealthStream course. We recommend investigators complete the course and review the policy before sharing or shipping materials.
- Link to Research Policy and Training:
<https://partnershealthcare.sharepoint.com/sites/phrmResources/c/Pages/Transporting-Biological-Materials.aspx>

Electronic Data

- Original data may not be transferred from the MGB institution. With appropriate authorization, copies may be provided to researchers who are leaving and returning to MGB on a short-term basis or permanently to a non-MGB institution. Each situation has different documentation requirements.

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- *Short-term travel*
 - PI authorization is required (memorialized in a letter), even if the traveler will be returning to the MGB institution, or authorization from the Chief if the PI is the traveler. The documentation must be in the traveler's possession throughout the trip.
 - See the Research Navigator for instructions and template PI/Chief letter.
<https://partnershealthcare.sharepoint.com/sites/phrmResources/c/Pages/Data-Sharing-Collaboration-Tools.aspx>
- *Off-boarding*
 - We strongly recommend that MGB researchers whose employment has ended and who are traveling by plane **NOT** travel with MGB data on their electronic devices. Devices may be searched by Customs (CPB) and/or Department of Transportation (DOT) officials and seized if the traveler does not have documentation deemed appropriate by the reviewing federal official. PIs should investigate MGB alternative data transfer methods. Information on data transfer tools is available on the Research Navigator at the link below.
 - We also strongly recommend that investigators do **NOT** travel with non-MGB data, e.g., dissertation data from a non-MGB institution, on an electronic device. There have been several instances where these data have not been returned to the traveler or held for months by the federal agency delaying research programs or graduation.
 - Follow your hospital/department's transfer-out procedures when departing permanently for another institution. With PI approval, copies of data may be shared with the departing investigator under a Data Use Agreement (DUA) negotiated by the appropriate MGB Contracting Office. While, as noted above, we strongly encourage other means of transfer, if the data are included on the departing investigator's electronic device(s) and they are traveling by plane, they must have a fully executed DUA for CPB or DOT officials or risk seizure of their device(s) and data.
 - On occasion a departing postdoctoral fellow or visiting scientist may leave MGB without an institutional affiliation and may need access to data to complete a publication. To facilitate these data sharing arrangements, hospital Research Compliance and select Department Research Management Offices are available to work with PIs to facilitate the appropriate data sharing arrangements. PIs should review the [DUA/DAA Decision Tree](#) to identify the hospital office responsible for generating an agreement and information the office will need to process their request.
 - Link to Research Navigator:
<https://partnershealthcare.sharepoint.com/sites/phrmResources/c/Pages/Data-Sharing-Collaboration-Tools.aspx>

If you have questions, please contact the individuals identified in the associated Research Navigator link.