Who has access?

Q: I was wondering if this secure platform was available to researchers who collect data that need to be kept secure but who don't have grant funding?

A: *There are costs associated with the use of the RDE service, but they do not have to necessarily be paid with grant funds. It is the responsibility of the researcher seeking to use the RDE service to identify and arrange for funding in order to utilize the service.*

Q: Is this system accessible only to WSU employees, or could non-WSU researchers obtain access as well, to facilitate collaborative research?

A: The RDE will support the creation of credentials for non-WSU personnel.

Q: Can someone use this if they have non-regulated data?

A: *Yes. But the RDE is intended for use with regulated data and the cost of the service reflects the expenses associated with the use and storage of such data. As data that is not regulated may be stored more efficiently elsewhere, that should be taken into consideration when deciding how to manage your data.*

What is it?

Q: How will this impact current research and budgets that were created and developed before this change was known? Will there be transparency in how this is going to come about in budgets?

A: *Unfortunately, we do not have a definitive answer as "it depends." Funded research should already include costs for covering expenses associated with meeting the regulatory requirements. If true total costs of compliance were included (and funded), then the impacts should be negligible. Our pilots to date have shown that meeting the technical aspects of the regulatory requirements in the cloud are less expensive than meeting those same requirements with on-premise infrastructure. Regardless of whether total costs were included in the proposal, all costs must be covered. As for transparency, the RDEs have quite granular reporting capabilities and will readily show that the research projects are only paying for what they actually consume.*

Q: How do researchers know that the RDE service meets the data security requirements of their project? If there is a security breach will the institution and will the investigator remain liable even though the data was stored through the RDE service?

A: *Before any RDE is released for production, a crosswalk between implementation and regulatory requirements will be completed documenting compliance. In some cases, regulatory requirements include a third-party assessment which is strongly recommended for all RDEs. Liability is a shared responsibility between WSU and the appropriate department conducting the research. Our role is to facilitate the discussions and offer an environment that we feel is compliant. As an example, even though the RDE is compliant access to it and data downloaded from the environment must also meet the security requirements.*

Q: Under this system, what is going to be the process for researchers for storing and accessing actively collected data synchronously?

A: *This is the design component of an RDE that will get a fair amount of attention, as each research endeavor can have widely differing data onboarding and offboarding processes. The outcome will ensure that regulated data entering and leaving the RDE meets the data handling requirements. Generally speaking, this includes encryption at rest as well as in-flight over networks, in addition to ensuring each device along the way is managed to a given standard commensurate with the risk of loss of data.*

Q: I'm not totally sure how the cloud service integrates with and is different from the existing network and server environment. I'm guessing it's like another server for data, but I'm not sure how to now describe our local area networks. Who should I reach out to for the correct language?

A: *RDEs are WSU's implementation of the modern Secure Enclaves. Secure Enclaves are carefully architected cloud-based compute, storage, memory and network resources with a hardened security network perimeter ("bubble"). This network perimeter is designed to allow data to flow in and out of the "bubble" under very specific and tightly controlled ways. A key attribute of RDEs/Secure Enclaves is they readily support attestation against the appropriate regulatory requirement. This is in stark contrast to most on-premise servers which were designed to allow information to flow relatively freely throughout WSU and in many cases, to the world. Finally, we recommend you coordinate with your Area Technology Officer for assistance in identifying and describing your local infrastructure environment.*

When must they use it?

Q: Where do I find information to determine if I am using or housing/storing regulated data?

A: *Regulated data is defined as information that is specifically protected by federal, state, or industry laws, regulations, or standards for which strict protection, use, and handling are dictated. Some examples of regulated data include Family Education Rights and Privacy Act (FERPA), Health Insurance Portability and Accountability Act of 1996 (HIPPA), and Regulations Governing the Protection of Research Data (e.g., Federal Information Security Management Act (FISMA)). Other examples of regulated data include any Personal Identifying Information (PII) such as social security numbers or non-deidentified data that could be used to determine the research subject's identity. To determine if you're housing or storing regulated data, EP#8 is a great resource, as is BPPM 87.01, and you can additionally ask ITS to do an audit of your information to see if you're using or storing regulated data. Please coordinate with your Area Technology Officer for assistance in coordination of the audit.*

Q: What descriptions or information exist to demonstrate that this change meets or fulfills federal level or state agency requirements for FISMA or data sharing?

A: *The definition of success for an RDE implementation is the federal, state, or other requirements – FISMA, data sharing or otherwise. RDEs are not magic bullets. They are cloud-based compute, memory, storage and network building blocks assembled to a standard that allows that environment to be operated in such a way as to meet the pre-defined regulatory requirements. This environment also offers a security dashboard that monitors compliance in a continuous manner. The controls may be fixed so that they cannot be inadvertently altered by the user.*

Where do we find more information about this?

Q: Is there a document or site that gives us more information on how to use RDE available at WSU?

A: *Absolutely. This document should help you with any frequent asked questions about RDEs, and EP#8 will provide some guidance as well. Additionally, ITS will have more information for faculty and staff in the near future.*

How will this change what we do now?

Q: What WSU support tools (i.e., manual or security descriptions) are available to understand how currently fielded and/or fielding research and data collections are to adapt to this change?

A: For the pilot implementations we have a set of documentation that was used to create the RDE including requirements for "our side of the fence" including, in one case, a third-party assessment. However, at this time we have to finalize a process by which current research and associated data can be moved into the new environment. ITS is open to a conversation to better understand the current environment and how we can help researchers transition to the new environment.

Q: What is the pace of this change and requirement? Why now?

A: *Currently there are a number of active research projects that have no on-premise infrastructure solution for how the research is going to meet regulatory requirements that WSU must agree to in accepting the funding. Our top priority is to address those who have no on-premise infrastructure solution. Secondly, is to identify research projects that have existing (on-premise) solutions but have yet to be reviewed, or preferably, assessed. The resolution of this second priority may entail moving the research into an RDE as very few, if any, on-premise solutions meet any of the stringent regulatory requirements and the cost of making them compliant far exceeds the cost of an RDE. Finally, the third priority is to create the onboarding processes for RDE in collaboration with the Research Office that allows researchers to apply for grants knowing an RDE will be waiting for them when funded.*

The pace of this change will be proportionate to the demand for these three priorities and the resources we have available to commit to them.

Q: What is the cost that we should work into proposals?

A: *Costs are directly proportional to the amount of CPU, memory, storage, and in some cases, network consumed. Please reach out to Bill Bonner to schedule a meeting to discuss specific IT resources need for which cost estimates can be prepared.*

Q: The memo seems to imply that **all** federally funded research must be moved into an RDE. Is this true?

A: *No, only research that has specific regulatory requirements (federal or otherwise) needs to be moved into an RDE unless you can provide written attestation that you are now operating in full accordance with the applicable regulation requirements.*

Q: I believe I am currently conducting research within a secure compute environment. Do I need to move out of that environment into an RDE?

A: *If you are operating within an environment that can provide written attestation that is meeting the applicable regulatory requirements, then no, you do not need to move. An example of this is research begin conducted in WSU's centrally-managed REDCap environment.*