Compliance with NSF and NIH Responsible Conduct of Research (RCR) Training Requirements

Policy Type: Administrative
Responsible Office: Office of Research and Innovation, Office of Research Administration and Compliance
Initial Policy Approved: 12/04/2014
Current Revision Approved: 09/07/2016

Policy Statement and Purpose

National Science Foundation (NSF) Requirements and Implementation

Effective January 4, 2010, the Authorized Organizational Representative of Institutions that apply for financial assistance from NSF for science and engineering research or education must certify that the institution has a plan to provide appropriate training and oversight in the responsible and ethical conduct of research to undergraduates, graduate students, and postdoctoral researchers who will be supported by NSF to conduct research.

As of January 4, 2010, all undergraduate students, graduate students and postdoctoral researchers supported by NSF to conduct research must complete Responsible Conduct of Research training**.**

Beginning with applications submitted to NSF on January 4, 2010, each Principal Investigator (PI) shall certify at time of proposal submission that all undergraduate students, graduate students and postdoctoral researchers to be supported by an NSF award will complete a Virginia Commonwealth University program of training in RCR.

As stated before, NSF requires all recipients of its funds to complete Responsible Conduct of Research training. In addition, NSF requires the completion of RCR training to be documented. NSF Principal Investigators will be required to electronically submit the RCR Training Completion Form (found in the "forms" section of this policy).

More specific information can be found in the "Procedures" section of this policy.

National Institutes of Health (NIH) Requirements and Implementation

NIH requires that all trainees, fellows, participants, and scholars who receive support through any NIH training, career development award (individual or institutional) research education grant, and dissertation research grant must receive instruction in RCR. This requirement will take effect for all new and renewal applications submitted on or after January 25, 2010, and all continuation applications with

deadlines on or after January 1, 2011. This applies to the following programs: **D43, D71, F05, F30, F31, F32, F33, F34, F37, F38, K01, K02, K05, K07, K08, K12, K18, K22, K23, K24, K25, K26, K30, K99/R00, KL1, KL2, R25, R36, T15, T32, T34, T35, T36, T37, T90/R90, TL1, TU2, and U2R.** This policy also applies to any other NIH-funded programs supporting research training, career development, or research education that require instruction in responsible conduct of research as stated in the relevant funding opportunity announcements or awards.

As of January 25, 2010, all trainees, fellows, participants, and scholars supported through any NIH training, career development award (individual or institutional), research education grant, or dissertation research grant must complete Responsible Conduct of Research education as a part of their program.

The NIH has a strict guideline for frequency of RCR training. The following is taken directly from grants.NIH.gov: "Frequency of Instruction: Reflection on responsible conduct of research should recur throughout a scientist's career: at the undergraduate, post-baccalaureate, predoctoral, postdoctoral, and faculty levels. Institutional training programs and individual fellows/scholars are strongly encouraged to consider how to optimize instruction in responsible conduct of research for the particular career stage(s) of the individual(s) involved. Instruction must be undertaken at least once during each career stage, and at a frequency of no less than once every four years. It is highly encouraged that initial instruction during predoctoral training occurs as early as possible in graduate school. Individuals at the early career investigator level (including mentored K awardees and K12 scholars) must receive instruction in responsible conduct of research at least once during this career stage. Senior fellows and career award recipients (including F33, K02, K05, and K24 awardees) may fulfill the requirement for instruction in responsible conduct of research by participating as lecturers and discussion leaders. To meet the above requirements, instruction in responsible conduct of research may take place, in appropriate circumstances, in a year when the trainee, fellow or career award recipient is not actually supported by an NIH grant."

Each PI shall certify at time of proposal submission that all individuals to be supported by a NIH training, career development, research education grant, or dissertation research grant award will complete an appropriate program in Responsible Conduct of Research in accordance with the NIH guidelines.

Responsible Conduct of Research Education

This policy treats RCR education and RCR Training as two different processes. RCR education requirements are administered at the program level, and may be program specific. RCR education requirements represent VCU's commitment to conduct responsible and ethical research at VCU.

RCR education at VCU follows NIH best practices. RCR education should include participant discussion and small-group discussions about case studies. Online courses should be viewed as a supplement to face-to-face instruction, and generally should not be considered sufficient as the sole means of providing RCR education at VCU.

Responsible Conduct of Research Training

RCR training is tracked by the Office of Research and Innovation and is intended to meet certain NSF compliance standards.

RCR training and education requirements are not the same at each level of a student's career whether that is undergraduate, graduate, or postdoctoral. Furthermore, each program may have RCR education requirements for students to satisfy as a part of that program's curriculum.

With respect to frequency of instruction, VCU requires mandated RCR training once during a specific career stage (e.g., undergraduate, graduate, postdoctoral). The Office of Research and Innovation may accept certain program specific RCR education as satisfying the NSF RCR training requirements. If a program wants the Office of Research to recognize one of their RCR education courses as sufficient to satisfy training requirements the program should submit the course information to the Office of Research and Innovation for review.

VCU courses in responsible research conduct that meet the federal requirements are included in a complete matrix identifying format, target audience, course restrictions, etc. and is available at: http://www.research.vcu.edu/responsible_conduct/rcr_courses.pdf.

In the event that an undergraduate student, graduate student, or postdoctoral researcher fails to complete the required RCR training, the salaries and/or wages along with any associated fringe benefits for that individual must be removed from the NSF funded project. The PI's program or department will be responsible for covering any salary, wages, and fringe benefits determined unallowable as a result of noncompliance with this policy.

Noncompliance with this policy may result in disciplinary action up to and including termination. VCU supports and environment free from retaliation. Retaliation against any employee who brings forth a good faith concern, asks a clarifying question, or participates in an investigation is prohibited.

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Who Should Know This Policy

All individuals involved with NSF grants and NIH trainee grants are responsible for knowing this policy and familiarizing themselves with its contents and provisions.

Definitions

Principal Investigator (PI)

a) The individual with final responsibility for the conduct of research or other activity described in a proposal or an award; b) the individual with fiduciary responsibility for an award's management. Usually these are the same individual. However, VCU has a requirement that the fiduciary responsibility vest in an employee, so on occasion they may be different; a common example is that the recipient of a research fellowship is explicitly not an employee, so that person's major professor manages the award's account.

RCR Education

RCR education is administrated at the program level, and is program specific. RCR education requirements represent VCU's commitment to conduct responsible and ethical research at the University.

RCR Training

RCR training is tracked by the Office of Research and Innovation and is intended to meet certain NSF compliance standards.

Contacts

The Office of Research and Innovation officially interprets this policy. The Office of Research and Innovation is responsible for obtaining approval for any revisions as required by the policy *Creating and Maintaining Policies and Procedures* through the appropriate governance structures. Please direct policy questions to the Office of Research and Innovation.

Policy Specifics and Procedures

NSF RCR Training Tracking

The Office of Research Administration and Compliance will monitor compliance with the NSF requirements by tracking RCR training completion.

Each principal investigator will be required to submit a completed RCR Training Completion Form for each undergraduate student, graduate student, or postdoctoral researcher appointed to their NSF grant.

If a student is unable, due to scheduling conflicts, to attend or complete one of the already established RCR courses an alternative plan of study may be devised and submitted to the Office of Research Administration and Compliance via an Alternate RCR Training Completion Form. The Alternate Training Form will be emailed automatically to the PI when the "alternate training form" option is selected on the standard RCR Training Completion Form.

Each semester, the Office of Research Administration and Compliance will obtain a listing of all individuals paid from applicable NSF accounts. Reminders will be sent to PIs if the Office of Research has not yet received the RCR Training Completion Form confirming that the PIs' undergraduate students, graduate students or postdoctoral researchers have completed the training.

If there is evidence that acceptable training has been successfully completed at another institution in keeping with these prescribed timeframes, the Office of Research Administration and Compliance will determine if that training meets the NSF RCR requirement. To submit evidence, simply fill out the RCR Training Completion Form, mark the space indicating "Training completed at another institution," and attach the evidence of that training with the RCR Training Completion Form.

NIH Education

NIH requires that all trainees, fellows, participants, and scholars who receive support through any NIH training, career development award (individual or institutional) research education grant, and dissertation research grant must receive instruction in RCR.

The Office of Research and Innovation will not track NIH RCR education. While NIH RCR education may consist of classes listed in the VCU RCR Course Matrix, it should be administered at the program level.

Forms

      1. RCR Training Completion Form

Related Documents

      1. VCU RCR Course Matrix
      2. NSF Responsible Conduct of Research
      3. NIH Responsible Conduct of Research

Revision History

This policy supersedes the following archived policies:

December 04, 2014   *Compliance with NSF and NIH Responsible Conduct of Research (RCR) Training Requirements*

FAQ

1. **Does a student or postdoctoral researcher being paid from my NSF grant only for the summer have to take the training?**

   Yes. All undergraduate students, graduate students and postdoctoral researchers participating in the proposed research project must take the training regardless of the amount of time supported by the grant. In addition, any non-VCU undergraduate students, graduate students and postdoctoral researchers <u>supported</u> by NSF to conduct research at VCU must complete RCR training in accordance with this policy.

2. **Should I wait until someone from the Office of Research and Innovation contacts me to inform my undergraduate students, graduate students and postdoctoral researchers of this requirement?**

   No. Please inform these individuals as soon as they begin working on the grant so that they can review the acceptable courses and register in a timely manner.

3. **My advisor says I must take OVPR 602 to meet degree requirements. Does the online CITI Responsible Conduct of Research course replace this requirement?**

   No. The online CITI Responsible Conduct of Research course can be used only to meet the NSF RCR training requirement.