Responsible Conduct of Research: Investor Procedures

Office of Research, Innovation, and Economic Development
Research Integrity and Compliance

June 2019
Table of Contents

Introduction .................................................................................................................................................. 3
NSF Policy................................................................................................................................................... 3
  Educational Program................................................................................................................................. 3
  Campus Procedure.................................................................................................................................. 3
NIH Policy .................................................................................................................................................. 4
  Educational Program................................................................................................................................. 4
  NIH Reporting and Compliance ................................................................................................................. 4
  Campus Procedure.................................................................................................................................. 4
Introduction
The responsible and ethical conduct of research (RCR) is critical for excellence, as well as public trust, in research. Consequently, education in RCR is considered essential in the preparation of future researchers. The National Science Foundation (NSF) and National Institutes of Health (NIH) have added requirements for the completion of RCR education.

This document describes federal requirements for the Responsible Conduct of Research (RCR) training. Learner groups and course requirements will vary depending on the funding agency. Please review the funder specific requirements below and the procedures for fulfilling those requirements. Please forward any questions to Leah Vargas, Research Integrity and Compliance Officer, at leah.vargas@csus.edu.

NSF Policy
In 2010, NSF implemented Section 7009 of the America COMPETES Act. The Act requires that each institution that applies for financial assistance from the Foundation provide appropriate training and oversight in the responsible and ethical conduct of research to undergraduate students, graduate students, and postdoctoral researchers supported by NSF funding to conduct research.

Educational Program
The RCR training requirement for NSF funded student researchers must be completed prior to research conduct and can be satisfied through one or more of the following pathways:

1) Online CITI Training - RCR Course Registration Guide
2) Philosophy 56 - this six-week Research Integrity course offers 1 unit for credit/no credit.

Campus Procedure
NSF requires institutional verification of RCR training completion. To meet this requirement, the Office of Research, Innovation, and Economic Development’s Research Integrity and Compliance Officer collects student researcher names from the Principal Investigator in the NSF Financial Conflict of Interest disclosure form, collected annually during the life of the grant. Student names will be matched to certifications in CITI. As part of the Philosophy 56 course, students take the CITI course to obtain certification and the same procedure will apply.
NIH Policy

The National Institutes of Health requires that all trainees, fellows, participants, and scholars receiving support for Research Training Grants (T32, T34), Career Development Awards (individual or institutional), Research Education Grants, and Dissertation Research Grants must include an explanation of an educational program in the responsible conduct of research.

Educational Program

Funding Opportunity Announcements will identify when RCR training is required. The RCR training requirement for NIH can be satisfied through one or more of the following pathways:

1) **Develop an educational program for the grant** - See the Instructional Component section for information.

2) **Philosophy 56** - this six-week Research Integrity course offers 1 unit for credit/no credit. For non-student researchers, other training arrangements will be required.

NIH Reporting and Compliance

NIH requires direct reporting on instruction in RCR in the initial proposal and in continuation (Type 5) applications.

NIH expects that course attendance is monitored and that a certificate or documentation of participation is available to NIH or the institution upon course completion. NIH does not require certification of compliance or submission of documentation directly, but expects institutions to maintain records sufficient to demonstrate that NIH-supported trainees, fellows, and scholars have received the required instruction.

Campus Procedure

It is the responsibility of the Principal Investigator to maintain records sufficient to demonstrate that NIH-supported trainees, fellows, and scholars have received the required RCR instruction.

The Office of Research, Innovation, and Economic Development’s Research Integrity and Compliance Officer obtains verification of this NIH compliance component from the Principal Investigator in the PHS Financial Conflict of Interest disclosure form, collected annually during the life of the grant.