### **Policies**

National Science Foundation (NSF) National Institute of Food and Agriculture (NIFA) National Institutes of Health (NIH)

### Forms

None

## **Related Links**

<u>CITI RCR Training</u>

# **Overview**

Formal instruction in the responsible and ethical conduct of research (RCR), <u>as defined by</u> <u>federal agencies and by various scientific societies</u>, covers the following content areas:

- Mentor/traineeresponsibilities
- Data acquisition, management, sharing, and ownership
- Research ethics and the role of the scientist
- Collaborative science
- Peer review
- Publication practices and responsible authorship
- Research misconduct
- Conflicts of interest and commitment
- Research involving animals
- Research involving human subjects
- Safe laboratory practices

To date, the National Science Foundation, the National Institute of Food and Agriculture, and the National Institutes of Health have set forth specific RCR requirements for recipients of research funding.

#### National Science Foundation (NSF)

Effective January 4, 2010, <u>all undergraduate students</u>, <u>graduate students</u>, <u>and postdoctoral</u> <u>researchers supported by NSF to conduct research</u> ("Participant"<sup>1</sup>) must receive appropriate training in the responsible and ethical conduct of research. NSF requires this training only for projects that are research in nature. Each institution applying for NSF funds must have in place a plan to provide the training and oversight. Such plans are subject to review upon request by NSF. The University of Missouri utilizes the Collaborative Institutional Training Initiative (CITI) program to provide RCR training that meets the requirements of the NSF policy. The MU Office of Sponsored Programs Administration (OSPA) oversees compliance by way of payroll and training reports.

#### National Institute of Food and Agriculture (NIFA)

Effective for awards subject to the NIFA's February 2013 Research Terms and Conditions (and those issued subsequently), program directors, faculty, undergraduate students, graduate

<sup>&</sup>lt;sup>1</sup> For the purposes of applying the NSF requirement for RCR training the term "Participant" shall apply to those *undergraduate students, graduate students, and postdoctoral researchers* paid with agency funds.

<u>students</u>, postdoctoral researchers, and any staff participating in the research project ("Participant"<sup>2</sup>) must receive appropriate training and oversight in the responsible and ethical conduct of research. NIFA requires this training only for projects that are research in nature.

Each institution applying for NIFA funds must assure that the appropriate individuals receive training and must maintain documentation of such training. Documentation of training is subject to review upon request by NIFA. The University of Missouri utilizes the CITI program to provide RCR training that meets the requirements of the NIFA policy. OSPA oversees compliance by way of payroll and training reports.

The NIFA RCR requirement applies to both sponsored projects and formula funding. Formula funds are recorded on program codes C8010, C8011, C8012, C8013, E8020, E8000, E8010 and E8011.

#### National Institutes of Health (NIH)

Current NIH policy concerning training in the responsible and ethical conduct of research is effective with all new and renewal applications submitted on or after January 25, 2010, and for all continuation (Type 5) applications with deadlines on or after January 1, 2011. Under NIH policy, <u>all trainees, fellows, Participants, and scholars receiving support through any NIH training, career development award (individual or institutional), research education grant, and dissertation research grant must receive instruction in RCR. Unlike NSF and NIFA policies where CITI RCR training alone meets sponsor requirements, RCR training for applicable NIH projects<sup>3</sup> must meet additional criteria (<u>NOT-OD-10-019</u>):</u>

While online courses can be a valuable supplement to instruction in responsible conduct of research, online instruction is not considered adequate as the sole means of instruction. A plan that employs only online coursework for instruction in responsible conduct of research will not be considered acceptable, except in special instances of short-term training programs, or unusual and well-justified circumstances. Instruction should involve substantive contact hours between the trainees/fellows/scholars/Participants and the participating faculty. Acceptable programs generally involve at least eight contact hours.

New NIH training, career development award, research education grant, and dissertation research grant applications (proposals) must include a plan for instruction in responsible conduct of research and must describe how participation will be monitored. Renewal applications, in addition to the criteria for new applications, must describe past and future changes that address any weaknesses in the current instruction. Applications lacking a plan for instruction in responsible conduct of research will be considered incomplete and may be delayed in the review process or not reviewed.

Information on the nature of the instruction in the responsible conduct of research and the extent of fellow and faculty participation also must be provided in the annual progress report submitted as a prerequisite to receiving non-competing continuation support.

<sup>&</sup>lt;sup>2</sup> For the purposes of applying the NIFA requirement for RCR training the term "Participant" shall apply to those *program directors, faculty, undergraduate students, graduate students, postdoctoral researchers, and any staff* paid with agency grant funds or capacity funds.

<sup>&</sup>lt;sup>3</sup> Applicable NIH programs include **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**.

# **Risk**

Instances of RCR non-compliance may result in a Participant's discontinued participation on the sponsored research project, possibly leading to the student's inability to complete academic goals or the researcher's inability to complete project objectives. In addition, the associated costs are deemed unallowable unless RCR training is completed. The department that manages the sponsored project is responsible for the unallowable expenses.

# Procedure

*Principal Investigator (PI)* – The PI is responsible for identifying individuals under his or her supervision who are subject to sponsor-specific RCR training requirements and for ensuring that those Participants complete appropriate training. The PI must provide appropriate oversight in the ethical and responsible conduct of research for all personnel participating in the research project.

For NSF- and NIFA-funded research projects, the PI should refer the Participant(s) to the <u>CITI</u> <u>RCR Training page</u> on the MU Office of Research website to access and complete training. Alternatively, Participants may substitute a qualified MU course for the CITI RCR training with the approval the University's Research Integrity Officer.

For applicable NIH-funded projects, the PI guides Participants in instruction as outlined in the project plan and monitors and reports annually to the sponsor throughout the life of the award. PIs may utilize an <u>approved course, such as the one provided by the MU School of Medicine, (MPP</u> <u>8415)</u>, or other program that meets the requirements of the NIH policy.

*Participant* – Completes CITI RCR training within 30 days of notification and/or completes an alternate prescribed course of study, as determined by sponsor policy, the PI, and the University Research Integrity Officer.

OSPA Senior Grants and Contracts Administrator (SGCA) – For NSF- and NIFA-funded research projects, the SGCA notifies the PI of the RCR training requirement.

OSPA Compliance Team – The Compliance Team regularly runs a report to identify all Participants on NSF-funded research projects and NIFA-funded research projects who have not completed RCR training. For all Participants newly identified on the report, the Compliance Team notifies the PI and Participant by email of the pending RCR training requirement. For all Participants on the report, the Compliance Team sends a follow-up email until OSPA obtains confirmation that the Participant has completed training.

OSPA Post-award Team – In the event that RCR training is not completed, the OSPA Post-award Team works with the Department to transfer unallowable costs to an unrestricted chartfield.

Departmental Research Administrator (DRA) – The DRA assists the PI to ensure all required RCR training is complete and works with the OSPA Post-award Team to transfer unallowable costs from the sponsored project or federal program chartfield to an unrestricted chartfield.

## **Responsibilities**

Below is an outline of responsibilities as they relate to procedure.

Principal Investigator:

- Bears responsibility for all programmatic and financial aspects of an award.
- Ensures appropriate Participants on applicable research projects complete required RCR training.

Participant:

• Completes appropriate RCR training timely.

Office of Sponsored Programs Administration:

- Monitors RCR training status of qualifying Participants on NSF- and NIFA- funded research projects, as defined by respective policies.
- Notifies PI and Participant of pending RCR training requirement.
- Monitors allowable and unallowable costs related to fulfillment of RCR training requirement.

Departmental Research Administrator:

- Assists to meet all requirements as described above.
- Prepares Payroll Correcting Entries (PCE) when necessary, if an individual does not complete RCR training. Such transfers should debit a chartfield that is not a sponsored activity chartfield, nor a federal program chartfield.

## **Need Help?**

If you have questions or comments related to this procedure, contact OSPA at <u>muresearchospa@missouri.edu</u> or (573)882-7560.

## **Related Topics**

None

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