



Mount St. Mary's University Policy

Responsible Conduct of Research Training Plan

I. Purpose and Scope

In the interest of promoting sound and ethical research practices, all research assistants receiving external research funding from NSF or NIH must undergo Responsible Conduct of Research (RCR) training. Mount St. Mary's University (MSMU) embraces the notion that sound research is critical to the advancement of knowledge in all disciplines and further recognizes that numerous ethical questions may arise during the practice of research.

MSMU requires Principal Investigators to educate their student researchers in the responsible conduct of research (RCR) such that they not only learn appropriate methodologies for undertaking research in their respective disciplines but also receive training and mentoring with regard to the ethics involved in undertaking such activities.

A recent federal requirement mandates that *“each institution that applies for financial assistance from the [National Science] Foundation for science and engineering research or education describe in its grant proposal a plan to provide appropriate training and oversight in the responsible and ethical conduct of research to undergraduate students, graduate students, and postdoctoral researchers participating in the proposed research project.”*¹

The National Institutes of Health (NIH) enacted a similar policy for all new and renewal applications for any NIH training, career development award (individual or institutional), research education grant, or dissertation research grant awards. NIH requires that all trainees, fellows, participants, and scholars receiving support through these awards must receive instruction in responsible conduct of research. This policy took effect with all new and renewal applications submitted on or after January 25, 2010, [NIH Notice of update to NIH Policy NOT- OD-10-019].

¹ America Creating Opportunities to Meaningfully Promote Excellence in Technology, Education, and Science (COMPETES) Act (42 U.S.C. 1862o-1), Section 7009.

FINANCIAL POLICY

Effective Date:

Date Revised:

Supersedes:

Related Policies:

**Responsible Office/
Department:**

To be compliant with these requirements, Mount St. Mary's University has established this Plan. While the training is highly recommended for all individuals conducting research, the following individuals are required to demonstrate evidence of having successfully completed the RCR training:

- all MSMU student researchers working on an NSF-funded or NIH-funded project or receiving support from NSF or NIH in the form of a stipend or salary from new or continued NSF or NIH research grants as a result of proposals submitted after 4 January 2010.

II. Definitions

For the purpose of this Plan, responsible conduct of research is defined as the practice of scientific investigation with integrity. It involves the awareness and application of established professional norms and ethical principles in the performance of all activities related to scientific research and research in other disciplines.

III. Policy

A. Procedures and Responsibilities

While each discipline and type of research emphasizes different aspects of ethical training, there are core topics essential for all researchers, including:

1. Peer Review, Authorship, and Publication
2. Collaborative Research
3. Data Acquisition and Management
4. Conflict of Interest
5. Mentoring
6. Research Misconduct
7. Human Subjects Protection
8. Animal Welfare

B. Training in RCR

1. Training consists of completing one of the following approved RCR training resources.
2. The approved RCR training resource for independent study is:
 - Online Research Ethics Course, Practical Ethics Center, University of Montana (http://ori.hhs.gov/education/products/montana_round1/research_ethics.html)
This online course includes chapter quizzes and allows students to print out certificates of completion to verify student learning.
3. The approved RCR training resources that can be used as part of face-to-face discussion groups are:
 - ORI Introduction to the Responsible Conduct of Research Office of Research Integrity, US Dept. of Health and Human Services (<http://ori.hhs.gov/ori-introduction-responsible-conduct-research>)

- *On Being a Scientist: A Guide to Responsible Conduct in Research*: Third Edition (2009) (http://www.nap.edu/catalog.php?record_id=12192). Copies of the book are available to borrow from the Grants Manager's office.
4. Once training is completed, student researchers must sign and submit MSMU's RCR Training Certification Form to their PI along with any course certifications. The PI will sign the certification form and submit the original to the Grants Manager's office.

C. Institutional Responsibilities²

The responsibilities as described by the National Science Foundation include:

1. An institution must have a plan in place 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 noted in GPG Chapter II.C.1.e, institutional certification to this effect is required for each proposal.
2. While training plans are not required to be included in proposals submitted to NSF, institutions are advised that they are subject to review, upon request.
3. An institution must designate one or more persons to oversee compliance with the RCR training requirement. At Mount St. Mary's, the Grants Manager oversees compliance and the Dean coordinates the implementation of the plan.
4. Institutions are responsible for verifying that undergraduate students, graduate students, and postdoctoral researchers supported by NSF to conduct research have received training in the responsible and ethical conduct of research

D. Documentation and Reporting

1. The Grants Manager's office, through the Dean, will notify the Principal Investigator of the requirement for the documentation of the RCR training.
2. The Dean's office will track and record names, start dates, and RCR training completion dates of all affected student researchers when payroll authorizations are processed. Copies of certifications for all students who successfully complete RCR training will be retained in a dedicated RCR file for at least three years after completion of the project. Certifications will be kept on file in the Grants Manager's Offices.

E. PI Responsibilities

1. The PI is responsible for ensuring that the RCR training requirement is specified in the offer letter for any student researcher being hired for a position under an applicable research project.
 - a. The PI is responsible for ensuring that all of his or her employees for whom the RCR training pertains complete the training successfully within the required time period.

² From NSF's November 2013 *Award and Administration Guide* (AAG), 14-1, Part II. Chapter IV.B.

- b. The PI is responsible for ensuring that informal instruction occurs throughout the research training experience. Multiple approaches can be used to continue the instruction (reviewing articles, discussing case studies, discussing ethical aspects of the current research project, etc.).
- c. The PI is responsible for ensuring that the student researchers are aware of the university's policies on conflict of interest, human and animal subjects in research³, laboratory practices, and student misconduct⁴.
- d. The PI is responsible for providing the Grants Manager's Office with all relevant information (e.g., employee names and start dates) and documentation when requested, including copies of all signed certification forms.

Consequences for Noncompliance

Consequences for faculty, or student researchers failing to complete RCR training in a timely manner may include (1) discontinuance from participation in the funded research project, (2) withholding of grant salary or stipend until training is completed, and (3) withholding of other grant funds.

Related documents and forms

A sample offer letter with the RCR statement included and a sample certification form are included as appendices.

Oversight and Contacts

Oversight of the Responsible Conduct of Research training is a responsibility shared by the PI and the University, as represented by Grants Manager's office and is coordinated by the Dean.

More information regarding RCR training can be found on the Mount St. Mary's University website at <http://www.msmary.edu/academics/academic-affairs/provost/faculty-development.html>.

IV. Link to Procedures or Process

<https://msmary.edu/grants>

V. Policy Review

Reviewed at least every 4 years.

VI. Contact Information

Kathy Criasia, Grants Manager criasia@msmary.edu X5503

³ <http://msmary.edu/grants>

⁴ http://www.msmary.edu/student-life/code_of_conduct/

VII. Approval

Name

Signature

Title

Date