I. RESPONSIBLE CONDUCT IN RESEARCH

Responsible conduct in research is an imperative for Lamar University’s Faculty and students. With or without federal mandate the institution would embrace the opportunity to augment educational programming with this very important aspect of research.

THE NIH: According to the NIH’s notice “Update on the Requirement for Instruction in the Responsible Conduct in Research” Notice Number: NOT-OD-10-019, dated 11/24/09, upon award of any NIH Institutional Research Training Grants, Individual Fellowship Awards, Career Development Awards, Research Education Grants, Dissertation Research Grants or other grant programs with a training component that requires instruction in responsible conduct in research as noted in the Funding Opportunity Announcement, a formal training program which includes at least 8 hours of contact hours (face to face engagement) between faculty and trainees is required. This training program should be provided throughout the trainees’ scientific career and should occur as an undergraduate, graduate and post-doc student, as well as during Career Awards and other milestones in a scientist’s career.

Lamar University provides resources to assist in this effort. The on-line training certificate program CITI is available to faculty to assist in the development of a training program. The modules included in CITI can be used to guide and augment responsible conduct in research training in addition to face to face didactic interactions with students. Adequate training will include the following components:

a. Conflict of interest: personal, professional, and financial
b. Policies regarding human subjects, live vertebrate animal subjects in research and safe laboratory practices
c. Mentor/mentee responsibilities and relationships
d. Collaborative research including collaborations with industry
e. Peer review
f. Data acquisition and laboratory tools; management, sharing and ownership
g. Research misconduct and policies for handling misconduct (please see LU’s policy)
h. Responsible authorship and publication
i. The scientist as a responsible member of society, contemporary ethical issues in biomedical research, and the environmental and societal impacts of scientific research.

It is incumbent upon the Principal Investigator of an NIH award requiring responsible conduct in research training to prepare, administer and document the training provided to students involved in research.
THE NSF: Pursuant to the 2007 America COMPETES Act, the National Science Foundation has adopted a new certification requirement that becomes effective January 4, 2010. The new NSF Grant Proposal Guide states: “When submitting a proposal to NSF, the Authorized Organizational Representative is required to complete a certification 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.” The plan must also include a system to verify that the training has occurred. The plan does not have to be submitted with proposals, but NSF could request it at any time – and NSF could audit compliance. Currently, institutions are free to develop their own plans, and at present there are no NSF-recommended models.

Grantees must designate one or more persons to oversee compliance with the RCR training requirement. Grantees 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, in accordance with the plan the grantee has put in place for their organization.

Grantee shall ensure that these RCR requirements flow down to all sub-recipients, or are otherwise appropriately addressed in the sub-award instrument.

LU Policy

1. The Compliance Director for Research and Sponsored Programs Administration (ORSPA) will be responsible for maintaining documentation of compliance, informing NSF-funded faculty of the requirement when applicable and waiving specific requirements of the plan.

2. RCR (Responsible Conduct of Research) training will be required for all undergraduates, graduate postdoctoral researchers receiving wages (or working as volunteers) or receiving academic credit for participating in NSF-funded research. Upon completion of the online training, certification of the course is provided. Documentation of this certification will be required for participation in NSF funded research described above. RCR training will include the following components:

   a) Each student must successfully complete the appropriate CITI* module of RCR training. This requirement can be waived for students who have successfully completed an RCR workshop at another institution designed to satisfy NSF’s training requirement or other comparable training; the Provost will specify what constitutes appropriate documentation in these cases. Successful completion will be documented by attaching a certificate generated by the online training program or by other documentation acceptable to the Provost.
   b) After completion of the online course, students and postdoctoral researchers must provide the certificate of completion to the Compliance Director in
ORSPA and attach a copy to the F3.2 Personnel Action Form or F4.7 Request to Pay. A F3.2 or F4.7 will not be processed without the documentation and pay start date cannot be prior to date of completion of the course (unless determined comparable training has been received.)

b) PIs will certify that the student has received RCR training appropriate to the research and discipline.

3. PIs give the Compliance Director periodic updates listing the students participating in the research. The Compliance Director will facilitate this process by sending reminder emails to all faculty who are PIs on NSF grants at the beginning of each semester and before summer research begins.

4. Lamar University academic deans may amend this plan at any time after consultation with the Office of Research and Sponsored Programs and Compliance Director. Details of any amended plan will be sent to all faculty with NSF grants, the ORSP, and the Compliance Director and will be posted on the ORSPA websites. At a minimum, the plan will be reviewed and updated annually, no later than July 1 of each year (beginning July 1, 2011).

5. The Associate Provost for Research and Sponsored Programs Administration will make decisions on a case-by-case basis about students whose only participation in NSF funded research falls into one of the following situations:

   the active NSF grant funds equipment used in courses to provide research training;
   the active NSF grant funds research that is incorporated into the research training provided to students in a course.

6. All faculty and students will sign a form on which the faculty member indicates that he/she has provided RCR training appropriate to the discipline, research project, and level of undergraduate involvement for each of the 9 instructional areas identified by NIH (or provides an explanation for why the training hasn’t been provided, e.g. “not human subjects research”).

To access the training module, please go to http://www.citiprogram.org to complete the registration and follow the instructions for your RCR training. Please contact the Office of Research and Sponsored Projects Administration if you encounter any problems.

* CITI – Collaborative Institutional Training Initiative