

THE UNIVERSITY OF WEST ALABAMA  
Office of Sponsored Programs and Research  
**Responsible Conduct of Research (RCR) Plan**

## **Introduction**

The University of West Alabama strives to achieve excellence while meeting the educational needs of the State and particularly of the West Alabama area. The University also seeks to provide students opportunities for growth beyond the classroom through a wide range of extracurricular activities, programs, and services and through the maintenance of an environment of cultural and intellectual diversity. Through the total educational experience that it provides and through its encouragement of the free exchange of ideas among faculty, administration, and students, the University attempts to assist its students in developing the important qualities of independent thinking and respect for the ideas of others and in building firm foundations of personal integrity and character in order to realize their quests for a philosophy of life and for self-fulfillment. An integral part of the University's strategic plan is to foster growth across all areas of campus, and specifically, increase external funding.

The Office of Sponsored Programs and Research seeks to assist faculty and staff in their endeavor to secure external funding for their research projects and programs. The University of West Alabama is committed to create a research climate that promotes faithful adherence to high ethical standards in the conduct of research and scholarship without inhibiting the productivity and creativity of persons involved in research. Responsible Conduct of Research (RCR) is a cornerstone of public trust and critical for advancement to national prominence and excellence in research. To further emphasize this commitment to excellence and the established strategic plan, the University has developed this RCR plan to describe the requirements for training and to provide information related to the fundamental areas of RCR.

## **Federal Requirements**

**National Science Foundation (NSF).** The America COMPETES (Creating Opportunities to Meaningfully Promote Excellence in Technology, Education, and Science) Act impacts the National Science Foundation in several ways. Effective January 4, 2010,

NSF's implementation of section 7009 of this Act will also impact universities. The language specified below provides NSF's implementation of section 7009. (See Federal Register notice at <http://edocket.access.gpo.gov/2009/E9-19930.htm>) Institutional responsibilities:

- a.** 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.d, institutional certification to this effect is required for each proposal.
- b.** NSF's RCR requirement applies to the breadth of research disciplines that the Foundation funds. The training provided should be effective and must be appropriately tailored to the specific needs and circumstances at each institution. Accordingly, it is the responsibility of each institution to determine the content, focus and the delivery method for the RCR training. 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.
- c.** An institution must designate one or more persons to oversee compliance with the RCR training requirement.
- d.** 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.

NSF will not tolerate research misconduct in proposing or performing research funded by NSF, in reviewing research proposals submitted to NSF, or in reporting research results funded by NSF. Allegations of research misconduct are taken seriously and are investigated by NSF's Office of the Inspector General (OIG). OIG refers completed investigations of research misconduct to NSF for action. Upon findings of research misconduct, NSF will take appropriate action against individuals or organizations.

NSF has updated its Proposal and Award Policies and Procedures Guide (PAPPG, [https://www.nsf.gov/publications/pub\\_summ.jsp?ods\\_key=nsf19001](https://www.nsf.gov/publications/pub_summ.jsp?ods_key=nsf19001)) to incorporate changes as required by the America COMPETES Act which allows each institution to develop and

implement a responsible conduct of research plan that best meets the institution's need.

**National Institutes of Health (NIH) Policy.** Effective January 25, 2010, the revised NIH policy requires that 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 responsible conduct of research. This includes 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. This Notice 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. The NIH revised 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. <http://grants.nih.gov/grants/guide/notice-files/NOT-OD-10-019.html>.

New Institutional applications must include a plan for instruction in RCR, addressing the five instructional components outlined in the NIH policy and describing how participation in instruction in RCR will be monitored. Renewal Institutional applications must also describe changes in formal instruction over the past project period and plans for the future that address any weaknesses in the current RCR instruction and must name all training faculty who served during the past project period.

New Individual applications must include a section on instruction in RCR, appropriate to the career stage of the applicant, as part of the Research Training Plan or Candidate Information and Career Development Plan. Plans must document prior RCR instruction (including last completion date) during the applicant's current career stage, propose plans for future receipt of instruction or participation in delivery (as appropriate for career stage), describe the role of the mentor in RCR instruction and address the five NIH RCR instructional components. Renewal Individual applications must describe RCR instruction activities undertaken during the past project period and future plans to meet the frequency requirement (fifth instructional component).

In addition, the reporting requirements for continuations should be reviewed to ensure reporting is complete and accurate.

The NIH suggests that the RCR instructional program include the following topics: conflict of interest, responsible authorship, policies for handling misconduct, policies regarding the use of human participants and animal subjects, and data management. The proposed plan must include the five instructional components, 1. Format, 2. Subject matter, 3. Faculty Participation, 4. Duration of Instruction and 5. Frequency of Instruction, are described in detail in the NIH policy announcement (see link above) and should be reviewed in detail when preparing proposals to which they are applicable. **Applications for funding under the identified programs that do not include a plan for RCR instruction are considered incomplete.** Statements within these components that are particularly noteworthy include, “**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.**” and, “**Instruction must be undertaken at least once during each career stage, and at a frequency of no less than once every four years.**”

In addition to the programs identified above, this policy also applies to any other NIH-funded programs supporting career development, research training, or research education that require instruction in responsible conduct of research as stated in the applicable funding opportunity announcements. Investigators should contact the Office for Sponsored Programs and Research (205-652-3424) for assistance with identifying if the program requires inclusion of a plan for RCR instruction.

**Public Health Service (PHS) Policy.** In December of 2000, the Public Health Service issued a policy requiring all researchers supported by PHS funding to complete a program of instruction in the responsible conduct of research. Congress has suspended the policy and has asked the PHS to review the format and content of the policy. The Office for Research Integrity (ORI) is currently revising the policy and plans to re-release the policy in the future. The suspended policy required PHS supported researchers to engage in education on the following topics: data management and integrity, mentor/trainee responsibilities, publication

practices and responsible authorship, peer review, collaborative science, human subjects, research involving animals, research misconduct, and conflict of interest and commitment. Research institutions nationwide are taking steps to implement RCR educational programs prior to the re-release of the policy. Upon implementation of the revised PHS policy, the Office of Sponsored Programs and Research will assist faculty with addressing concerns and implementing required changes.

## **RCR Training Plan**

Beginning January 4, 2010, all NSF proposal submissions now include an institutional assurance that the University has a plan in place to provide appropriate RCR education to all students and post docs who will be supported by NSF, should the award be made.

Upon award notification, students and postdocs supported by the NSF awards resulting from proposals submitted on or after January 4, 2010 will be required to complete RCR online training. The University's procedures for notification, tracking and monitoring are intended to ensure required training is completed within three to five months of an individual beginning work on the project.

The University of West Alabama has selected the **Collaborative Institutional Training Initiative (CITI)** online platform to meet federal requirements in RCR. The CITI online courses are designed for faculty, staff (e.g. post docs), graduate students, and undergraduate students who have an interest or focus in the research areas targeted by federal support and serve to satisfy federal regulations that require RCR training as a part of grant and contract terms and conditions. The modules contain information about responsible conduct in research, case studies and quizzes related to each of the areas.

The CITI Program requires registration for use of its site. Each new user must register and create an individual username and password to gain access to the site by selecting "New Users Register Here" and selecting **UNIVERSITY OF WEST ALABAMA** in the "Participating Institutions" drop down box. <http://www.citiprogram.org>.

Faculty and staff who receive federal funding to conduct research or to supervise student researchers are responsible for ensuring all work is done in compliance with University,

Federal and other applicable policies. The Office of Sponsored Programs and Research has been charged with overseeing compliance with RCR training requirements and will assist researchers in identifying and completing appropriate RCR training, instruction, and guidance.

There are nine core areas covered by the CITI training modules that address those recommended by NSF and NIH:

- Acquisition, management, sharing, and ownership of data
- Publication practices and responsible authorship
- Conflict of interest and commitment
- Research misconduct
- Peer review
- Mentor/trainee responsibilities
- Collaborative science
- Human subjects protections
- Animal welfare

Note that these RCR courses are not substitute training courses for individuals who conduct research utilizing human participants or animals. If you plan to conduct research utilizing human participants or animals, you must also complete the required basic training courses in those areas.

**Human Subjects.** All research projects involving human subjects must be reviewed by UWA's Institutional Review Board (IRB). Information about conducting Human Subject research and training requirements is available on the Office of Sponsored Programs and Research website.

<https://www.uwa.edu/uploadedFiles/OSP2/UWA%20Human%20Subjects%20Policy.pdf>.

**Animal Subjects/Animal Care Policy.** All animal research projects must be reviewed by UWA's Institutional Animal Care and Use Committee (IACUC). Information about conducting animal research and training requirements is available on the Office of Sponsored Programs and Research website.

**Discipline Specific Online Courses.** There are five discipline specific online RCR courses available as outlined below:

1. **Biomedical Sciences Responsible Conduct of Research Course:** This course is for investigators, staff and students with an interest or focus in biomedical research.
2. **Social, Behavioral, and Education (SBE) Sciences Responsible Conduct of Research Course:** This course is for investigators, staff and students with an interest or focus in social and behavioral research.
3. **Physical Science Responsible Conduct of Research Course:** This course is for investigators, staff and students with an interest or focus in physical science or engineering research.
4. **Engineering and Computing Responsible Conduct of Research Course:** This course is for investigators, staff and students with an interest or focus in engineering or computing.
5. **Humanities Responsible Conduct of Research Course:** This course is for investigators, staff and students with an interest or focus in humanities research.

Individuals are required to complete only the most relevant discipline specific course.

**Additional Mandatory Training for NIH Students and Postdocs.** NIH sponsored students and post docs will be required to attend at least two workshops during the first two years of project participation in order to meet NIH RCR training requirements. Workshops will be offered throughout the academic year beginning fall 2016 if funding is secured from NIH. RCR training is required at least once during each career stage and at a minimum, of every four years.

**Copies of Training Certificates.** When a module is completed, a copy of the training certificate may be printed by logging into CITI ([www.citiprogram.org](http://www.citiprogram.org)), using one's username and password, and clicking the "Print" link under the Completion Reports column in My Courses. Copies of the training certificates should be forwarded to the Office of Sponsored Programs and Research via campus mail to UWA, Station 47, or via email at [cgiles@uwa.edu](mailto:cgiles@uwa.edu). OSPR will monitor for completion of the required on-line RCR training components and, for NIH funded students and post docs, required live (workshop) training.

## **Other Resources**

Office for Research Integrity Educational Material Clearinghouse

<http://ori.dhhs.gov/education/>

National Postdoctoral Association RCR Toolkit

<http://www.nationalpostdoc.org/publications/rcr/rcr-toolkit/302-nsf-2010-rcr-requirement>

NSF Proposal and Award Policies and Procedures Guide

[https://www.nsf.gov/publications/pub\\_summ.jsp?ods\\_key=nsf19001](https://www.nsf.gov/publications/pub_summ.jsp?ods_key=nsf19001)

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