

NSF and NIH Requirement for Training in Responsible Conduct of Research

Federal Requirements

Section 7009 of the COMPETES Act mandates that institutions applying for financial assistance from the National Science Foundation (NSF) provide training in the Responsible Conduct of Research (RCR) for undergraduate students, graduate students, and postdoctoral researchers participating in the proposed research project to be funded by NSF.¹ NSF has published regulations, effective January 4, 2010, that it will require that, at the time of proposal submission to NSF, a proposing institution's Authorized Organizational Representative certify 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.² The National Institutes of Health (NIH) have long had a similar requirement for Institutional National Research Service Award (NSRA) Research Training Grants (T32,T34).³ Additionally, NIH has now published a notice that requires RCR training for 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, TU1, AND U2R. This requirement 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.⁴

Protocol for University of San Diego Implementation

For all NSF grants as well as all NIH grants for programs covered above, the principal investigator (PI) must indicate agreement to participate in the university's efforts to comply both with the above federal requirements and with the Dean's Council decision that the PI should take the same RCR training so that he/she can discuss it with the researchers working on the grant project. This will be done on the standard External Funding Routing form already in use internally. If the grant is not funded, then there are no training obligations.

If the grant is funded, then prior to the grant funds being transferred to the PI's account the PI must submit to the Office of Sponsored Programs the names of and RCR training certificates for all undergraduates, graduate students, and postdoctoral researchers who the PI knows will be working on the funded project as well as a RCR training certificate for the PI. The university will provide access to an online RCR training program that such persons can take that will allow for the printing of a certificate for those who pass the program.

If during the grant period additional undergraduates, graduate students, and/or postdoctoral researchers join the project, then the PI will ensure that such persons take and pass the online RCR training program prior to beginning work on the project, and the PI shall provide the appropriate certificate to the Office of Sponsored Programs for each such person.

In accordance with NIH regulations, RCR training must occur no less than once every four years.

Approved by the Dean's Council – 5/6/14 and Amended 8/30/16

1 42 USC 1862o-1.

2 FR Doc. E-19930 Filed 8-19-09

3 NIH GUIDE, Volume 23, Number 23, June 17, 1994

4. NIH Notice NOT-OD-10-019