

Federal Sponsors' Requirement for Training in Responsible and Ethical 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 23-1 NSF Proposal & Award Policies and Procedures Guide (PAPPG) expands the RCR requirements to include ethical conduct, and titled Responsible and Ethical Conduct of Research (RECR) for proposals submitted on or after July 31, 2023. It fully replaces the existing NSF requirements, expands the requirement to faculty and other senior key personnel, and is mandated to include mentor training and mentorship. This includes any funding that is directly from NSF or flowing through another entity.³

The National Institutes of Health (NIH) have long had a similar requirement for Institutional National Research Service Award (NSRA) Research Training Grants (T32, T34).⁴ Additionally, NIH has now published a notice that requires RECR 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.⁵

Sections 2, 3, and 8 of 2 CFR Part 422 mandates institutions that conduct USDA-funded extramural research to foster an atmosphere conducive to research integrity, bear primary responsibility for prevention and detection of research misconduct, and maintain and effectively communicate and train their staff regarding policies and procedures. By accepting a National Institute of Food and Agriculture (NIFA) award, the grantee assures that program directors, faculty, undergraduate students, graduate students, postdoctoral researchers, and any staff participating in the research project receive appropriate training and oversight in the responsible and ethical conduct of research and that documentation of such training will be maintained. Documentation of the training by the grantee institution is subject to NIFA review upon request.⁶

Protocol for University of San Diego Implementation

For all federal grant programs covered above, the principal investigator (PI) must indicate agreement to participate in the university's efforts to comply with the above federal requirements for responsible and ethical conduct of research. 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 RECR training certificates

for the PI, all faculty, senior key personnel, undergraduates, graduate students, and postdoctoral researchers who the PI knows will be working on the funded project. The university will provide access to an online RECR training program that such persons can take that will allow for the printing of a successfully completed certificate.

During the grant period, if additional faculty, key personnel, undergraduates, graduate students, and/or postdoctoral researchers join the project, then the PI will ensure that such persons take and pass the online RECR training program prior to beginning work on the project. The PI shall provide the of Sponsored Programs for each such person.

In accordance with NIH regulations, RECR training for NIH includes both online and in person components, and should happen once during an investigator's early career stage and every four years thereafter.

1. 42 USC 1862o-1
2. FR Doc. E-19930 Filed 8-19-09
3. NSF PAPPG 23-1
4. NIH GUIDE, Volume 23, Number 23, June 17, 1994
5. NIH Notice NOT-OD-10-019
6. [USDA NIFA Research Terms and Conditions January 26, 2024](#)