

RCR Training Plan

Background

Congress passed Public Law 110-69, The America COMPETES Act on August 9, 2007. This law mandates that institutions receiving funds from the National Science Foundation (NSF) provide appropriate training and oversight in the responsible conduct of research for students (undergraduate and graduate) and postdoctoral researchers who are supported by the NSF.

Effective January 4, 2010, DU must certify on all proposals to the NSF that it has a plan to provide appropriate RCR training. To comply with this requirement, DU is requiring that all students and post doctoral researchers paid by salary or stipend from a National Science Foundation (NSF) sponsored project must complete an approved RCR training program. Generally, this training consists of nine topic areas covering: Data Acquisition and Management, Conflict of Interest and Commitment, Human Subject Research, Laboratory Animal Welfare, Research Misconduct, Publication Practices and Authorship, Mentor/Trainee Responsibilities, Peer Review, and Collaborative Science. **This requirement applies to awards resulting from proposals submitted after January 4, 2010 (“qualifying awards”).**

Training

PI's, students and postdoctoral researchers supported on qualifying awards are required to complete the on-line RCR training program provided by the Collaborative Institutional Training Initiative (CITI). Information for registering and completing the CITI course is available on The Office of Research and Sponsored Programs (ORSP) website at <http://www.du.edu/orsp/Responsible%20Conduct%20of%20Research.html>.

The required training must be completed within the first three months of employment/support on the qualifying award or earlier if circumstances dictate (e.g. summer employment).

Documentation of completion of this requirement will be maintained by ORSP via the CITI database. Additionally, a certificate of completion may be printed from the CITI site. A copy of the certificate should be kept by the trainee and the PI. The training certification will be valid for five years. Prior RCR training or coursework may be substituted for CITI training if certified by ORSP Manager of Research Compliance.

Procedures for Compliance

The responsibility for assuring compliance is a cooperative effort involving principal investigators, students, post doctoral researchers, department administrators, and ORSP. The following procedures define the roles and responsibilities of each of these parties.

- **Principal Investigator**
The Principal Investigator (PI) is responsible for fostering an environment of, and providing guidance in, the ethical and responsible conduct of research for individuals under his/her supervision. The PI must assure that individuals will complete the specified education requirements related to ethical and responsible conduct of research, and provide discipline specific mentoring to his/her students and post doctoral associates during the course of the sponsored project.
- **Trainees**
Students and postdoctoral researchers are responsible for completing the required training in a timely manner and availing themselves of opportunities to further inform themselves regarding the responsible conduct of research in their specific area of inquiry.
- **College and Department Administration**
Colleges and departments are required to assure compliance with this plan for all qualifying awards they administer.
- **Office of Research and Sponsored Programs**
ORSP is responsible for certifying on each proposal that DU has a plan for complying with the RCR requirement. In making this assurance, ORSP will rely on the Principal Investigator's certification of completion of training on the Proposal Review and Acceptance (PRA) form <http://www.du.edu/orsp/forms.html>. Upon receipt of a qualifying award, ORSP will remind the Principal Investigator and Departmental Administrator that they must comply with the RCR training requirement.

ORSP is responsible for providing oversight, educational resources, and monitoring compliance with this plan. ORSP will perform routine audits of training and payroll records to help ensure institutional compliance with the RCR requirements. The Manager of Research Compliance is charged with overseeing compliance with the RCR training requirement.

Consequences of Non-compliance

Adherence to this plan is a specific condition of the NSF award. Failure to comply may result in sanctions imposed by DU, such as restricting access to grant funds, or revocation of the award by the sponsoring agency.

Resources

Resources available through the ORSP Research Compliance include:

- Workshops to complement CITI training and other departmental offerings
- Individual consultation and advisement
- Review of prior RCR coursework or training
- Assistance in accessing the CITI program and other on-line resources