I. INTRODUCTION

Certain Federal funding agencies have adopted requirements for training in the responsible conduct of research for certain individuals supported by or participating in projects funded by those agencies. This document outlines FSU’s policy and procedures for ensuring compliance with these requirements. The Director of the Office of Research Compliance Programs (ORCP) is responsible for overseeing compliance with requirements for training in the responsible conduct of research.

II. POLICY

This policy applies to all individuals receiving salaries, stipends, one-time payments, or other support from certain Federal funding agencies requiring training on the Responsible Conduct of Research (RCR). In addition, USDA requires that all individuals participating in the research project receive training, not just those financially supported by the award.

As FSU is committed to promoting a culture of ethical and responsible research, all faculty, staff, students, and visitors engaged in research are encouraged to pursue training in this area.

Training Subject Matter

While there are no specific curricular requirements for instruction in responsible conduct of research, acceptable topics may include:

- conflict of interest – personal, professional, and financial
- policies regarding human subjects, live vertebrate animal subjects in research, and safe laboratory practices
- mentor/mentee responsibilities and relationships
- collaborative research including collaborations with industry
• peer review
• data acquisition and laboratory tools; management, sharing and ownership
• research misconduct and policies for handling misconduct
• responsible authorship and publication
• the scientist as a responsible member of society, contemporary ethical issues in biomedical research, and the environmental and societal impacts of scientific research

As of this date, those agency requirements, as well as FSU’s related procedures, are as follows:

**National Science Foundation (NSF)**

NSF requires FSU to certify in each application for funding that it has a plan in place to provide appropriate training and oversight in the responsible and ethical conduct of research for *undergraduates, graduate students, and postdoctoral researchers* who will be supported by NSF to conduct research. This Policy will serve as the plan referred to in the certification. NSF Principal Investigators (PIs) are responsible for ensuring that all undergraduates, graduate students, and postdoctoral researchers supported by NSF funds obtain the required training in a timely manner (see Timing of Training below). PIs are not required to report the RCR training in annual and final technical report submitted to NSF. See the [RCR webpage](#) at for training Options 1, 2, and 3, shown below, will satisfy this requirement for fulfilling this training requirement.

**Timing of Training:** NSF-supported postdoctoral fellows and graduate students must complete their training within two months of their initial appointment or assignment to the grant. NSF-supported undergraduates must complete their training within one month of their initial appointment or assignment to the grant.

The ORCP will prepare a report of students and trainees who are supported from NSF-funded projects each semester which will be matched against CITI (Collaborative Institutional Training Initiative) and FSU training completion records. Principal Investigators will be notified of any noncompliance. Documentation of compliance will be maintained by the ORCP and made available to NSF upon request.

**National Institutes of Health (NIH)**

NIH requires 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 receive training in the Responsible Conduct of Research. NIH’s policy 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.

- **Training Plan**: NIH requires an RCR Training Plan be included in each proposal submitted to one of the programs listed above. The plan must include substantial face-to-face discussions among the participating trainees, fellows, scholars, and participants; a combination of didactic and small-group discussions (e.g. case studies); and participation of research training faculty members in instruction in responsible conduct of research are highly encouraged. While on-line courses can be a valuable supplement to instruction in responsible conduct of research, online instruction is not considered adequate as the sole means of instruction. See the RCR webpage at for training options for fulfilling this training requirement.

- **Faculty Participation**: Training faculty and sponsors/mentors are highly encouraged to contribute both to formal and informal instruction in responsible conduct of research. Informal instruction occurs in the course of laboratory interactions and in other informal situations throughout the year. Training faculty may contribute to formal instruction in responsible conduct of research as discussion leaders, speakers, lecturers, and/or course directors. Rotation of training faculty as course directors, instructors, and/or discussion leaders may be a useful way to achieve the ideal of full faculty participation in formal responsible conduct of research courses over a period of time.

- **Frequency of Instruction**: Education on responsible conduct of research should recur throughout a scientist’s career: at the undergraduate, post-baccalaureate, predoctoral, postdoctoral, and faculty levels. Institutional training programs and individual fellows/scholars are strongly encouraged to consider how to optimize instruction in responsible conduct of research for the particular career stage(s) of the individual(s) involved. Instruction must be undertaken at least once during each career stage, and at a frequency of no less than once every four years.

- **RCR Casebook**: The Casebook provides case studies, role plays, and reflection questions to foster ethical problem-solving skills, promote sense-making skills, and increase a researcher’s awareness of the many dimensions in ethical decisions.

This 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.

NIH Principal Investigators are responsible for including information about their RCR training plan in every New (Type 1) and Renewal (Type 2) application, as well as Type 5 Continuation applications. Detailed requirements for each type of application were published in NIH Notice NOT-OD-10-019, Requirement for Instruction in the Responsible Conduct of Research. PIs are also responsible for ensuring that all undergraduates, graduate students, and postdoctoral researchers supported by NIH funds obtain the required training in a timely manner (see Timing of Training below). Training Options 1 and 3, shown below, will satisfy this requirement fully. Option 2 may only be used to partially satisfy the requirements, because NIH requires 8 hours of face-to-face discussions in addition to online training.

NIH provides the following guidance related to frequency of instruction:

“Instruction must be undertaken at least once during each career stage, and at a frequency of no less than once every four years. It is highly encouraged that initial instruction during predoctoral training occurs as early as possible in graduate school. Individuals at the early career investigator level (including mentored K awardees and K12 scholars) must receive instruction in responsible conduct of research at least once during this career stage. Senior fellows and career award recipients (including F33, K02, K05, and K24 awardees) may fulfill the requirement for instruction in responsible conduct of research by participating as lecturers and discussion leaders. To meet the above requirements, instruction in responsible conduct of research may take place, in appropriate circumstances, in a year when the trainee, fellow or career award recipient is not actually supported by an NIH grant.”

“Career stage” includes the undergraduate, post-baccalaureate, predoctoral, postdoctoral, and faculty levels.

NIH Principal Investigators are responsible for maintaining documentation of the training plan associated with each project, as well as records of all NIH-supported trainees, fellows, participants, and scholars who received the required training. Documentation of compliance will be maintained by the NIH Principal Investigator and made available to the ORCP and NIH upon request. Documentation includes, but is not limited to, CITI Completion Reports, class rosters with passing indicator, signed/dated faculty notes, etc.
**U.S. Department of Agriculture, National Institute of Food and Agriculture (NIFA)**

NIFA terms and conditions state: “By accepting a 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.” See the RCR webpage at [https://www.research.fsu.edu/research-compliance/rcr/](https://www.research.fsu.edu/research-compliance/rcr/) for training options for fulfilling this training requirement.

NIFA Principal Investigators are responsible for ensuring that each individual participating in the research project obtains the required training in a timely manner (see Timing of Training below). Documentation of compliance will be maintained by the USDA/NIFA Principal Investigator and made available to the ORCP and NIFA upon request. Documentation includes, but is not limited to, CITI Completion Reports, class rosters with passing indicator, signed/dated faculty notes, etc.

Training Option 2 shown below will satisfy this requirement. However, participation in the more substantive face-to-face courses possible through Options 1 and 3 is strongly encouraged.

By June 1 of each year, the ORCP will ask NIFA Principal Investigators to provide a list of all individuals who participated in the research project during the previous 12 months. The ORCP will match this data against CITI and FSU training completion records to ensure that all individuals received training. Documentation of compliance will be maintained by the ORCP and made available to NIFA upon request.

**Key Differences in Requirements**

Please note the following key differences among these three agencies’ policies:

- **NSF** requirements apply to research grants. Students who receive only scholarship or stipend support to enroll in an academic program through such NSF programs as S-STEM and Noyce are not required to receive RCR training. However, students must take RCR training if they receive NSF scholarship or stipend support to engage in research, or if conducting research is included in their academic program.

- **NIH** requirements apply to education and training grants only.

- **UDSA** requirements apply to all individuals participating in the research project, not just postdoctoral researchers and students financially supported by the grant.
Timing of Training

Postdoctoral fellows, graduate students, and USDA/NIFA project staff must complete their training within two (2) months of their initial appointment or assignment to the grant.

Undergraduates must complete their training within one (1) month of their initial appointment or assignment to the grant.

Training Options

New Course Proposals

Academic programs interested in offering a course that satisfies Option 3 RCR training requirements above should submit a “Proposal for Consideration of a Departmental Course to Meet the RCR Requirement” to Dr. Judy Devine in the Graduate School (jdevine@admin.fsu.edu). This document should be submitted in electronic format (preferably as a .pdf). The proposal will be reviewed by the Graduate School and the Office of Research, and, if necessary, by members of the Council on Research and Creativity.

The proposal should include the following elements:

1. The syllabus approved by the university curriculum committee.

2. Explanation as to how the course addresses each of the following topics highlighted by NIH’s Office of Research Integrity.
   
   o General research misconduct and professional standards
   o Falsification, fabrication, plagiarism
   o Human subjects protection (if applicable)
   o Welfare of animals used in research (if applicable)
   o Conflicts of interest
   o Data management practices
   o Mentor and trainee responsibilities
   o Collaborative research
3. Explain how learning will be assessed.

If the course is letter graded, satisfactory completion by the student to meet the Federal RCR training requirements requires a grade of B or better. If the course is S/U graded, specific benchmarks must be identified for attainment of satisfactory performance. Regardless of the grading format, a rigorous mechanism for assessment of learning must be in place. This should be described in the proposal (point 3 above).

The proposal should indicate how often the course is offered; whether it will be online, face-to-face, or a combination of both; and whether the course will be open to students from other programs. A list of approved FSU courses that meet Federal RCR training requirements will be published on the ORCP website.

Proposals will be considered at any time of the year.

III. LEGAL SUPPORT, JUSTIFICATION, AND REVIEW OF THIS POLICY

BOG 1.001(3)(m) and BOT Delegations to President

National Science Foundation, Responsible Conduct of Research, as published in NSF’s Proposal & Award Policies & Procedures Guide (PAPPG)

National Institutes of Health, Requirement for Instruction in the Responsible Conduct of Research, as published in Notice No. NOT-OD-10-019.


National Science Foundation, Responsible Conduct of Research, as published in NSF’s Proposal & Award Policies & Procedures Guide (PAPPG)

U.S. Department of Agriculture, National Institute of Food and Agriculture (NIFA), Responsible and Ethical Conduct of Research, as published in 2 CFR Part 422 Sections 2, 3, and 8. in the Federal-Wide Research Terms and Conditions, USDA/NIFA Agency-Specific Terms and Conditions.
Fla. Stat. 1004.22.

This policy will be reviewed periodically and updated when changes are necessary.

/s/

[Proof of approval retained in file]