State University of New York at New Paltz
Policy on the Responsible Conduct of Research (RCR) and Procedures

Purpose

Since January 4, 2010, institutions applying for National Science Foundation (NSF) research grants have been required to have a plan in place for ensuring that undergraduate students, graduate students, and postdoctoral scholars (referred to collectively hereafter as "students/scholars") supported by NSF awards to conduct research receive education in the responsible and ethical conduct of research.

The responsible and ethical conduct of research is critical for excellence, as well as public trust, in science and engineering. Consequently, education in RCR is considered essential in the preparation of future scientists and engineers. Section 7009 of the America Creating Opportunities to Meaningfully Promote Excellence in Technology, Education, and Science (COMPETES) Act (42 U.S.C. 1862o–1) requires that ''each institution that applies for financial assistance from the Foundation for science and engineering research or education describe in its grant proposal a plan to provide appropriate training and oversight in the responsible and ethical conduct of research to undergraduate students, graduate students, and postdoctoral researchers participating in the proposed research project."

Plan Summary

SUNY New Paltz's plan for providing this education includes a requirement that all students and postdoctoral scholars who receive support (salary and/or stipend) on NSF awards for the purpose of conducting research must successfully complete RCR training through the online Collaborative IRB Training Initiative (CITI). A passing score of 80% is required to earn a training certificate.

Evidence of successful completion is required prior to a student/scholar's appointment to an NSF award or processing of Participant Stipend forms. Completion certificates will be collected and maintained by the Office of Sponsored Programs (OSP) prior to funds being dispersed.

Definitions

The following NSF definitions are used for the application of this policy.

Research is systematic study directed toward fuller scientific knowledge or understanding of the subject studied. Research is classified as either basic or applied, according to the objective of the sponsoring agency:

> *Basic research* is systematic study directed toward fuller knowledge or understanding of the fundamental aspects of phenomena and of observable facts without specific applications toward processes or products in mind.

> *Applied research* is systematic study to gain knowledge or understanding necessary to determine the means by which a recognized and specific need may be met.

Roles and Responsibilities

OSP serves as the office of record for institutional verification that those subject to the policy have received training in the responsible and ethical conduct of research. Authorized Organizational Representatives (AORs) within OSP provide institutional certification on each NSF proposal that a training plan is in place

and in effect. Additionally, AORs within OSP and Post Award administrators are responsible for disseminating RCR policy information to Principal Investigators/Project Directors (PIs/PDs).

PIs/PDs are responsible for informing students and postdoctoral scholars that are to be supported on their NSF awards of the education requirements and for oversight of training completion. Training is to be completed prior to payments being processed by OSP. PIs/PDs are encouraged to supplement the CITI training course through discussion, reading, and other mentoring activities.

The Research Foundation (RF) Operations Manager is responsible for overseeing compliance with the RCR training requirements and for reporting institutional performance on an annual basis to the Provost and Vice President for Academic Affairs.

Applicability of RCR training requirements

Research subject to RCR requirements includes both basic and applied research projects. Research projects are systematic investigations designed to develop or contribute to generalizable knowledge, may be student-initiated or student-directed, and may be conducted within or outside of a course. Research exercises conducted as a course assignment for the purposes of research training are excluded from the RCR requirement.

Undergraduate and graduate students and postdoctoral scholars who receive salary support or stipends for the purpose of conducting research are subject to the RCR training requirements.

NSF guidelines exclude conference, travel, workshop, or symposium grants from the RCR requirement.

Exemptions/Waivers

PIs/PDs may request an exemption or waiver from the RF Operations Manager for a student or scholar.

Currently exemptions or waivers will only be given for:

- Students/scholars working exclusively in an administrative role on a project. Evidence that the student/scholar will not be engaging in research and will solely engage in administrative or non-research-related duties is required as a part of the request, e.g. budget justification or position description.

  Note: if in the course of the project, the nature of the student/scholar's role changes and they will be engaging in research, then this exemption automatically becomes null and void. The exemption becomes void the moment the covered individual engages in research activity. It is the PI/PD's responsibility to notify OSP of the change as soon as possible and to instruct the student/scholar to take CITI training, preferably before, but no later than 3 weeks after, engaging in research.

- Students/scholars who have completed RCR CITI training at a previous institution or who have completed a commensurate program of RCR education that can be substituted for CITI training. Evidence of completion must be substantiated by the previous institution. These requests will be considered on a case by case basis.

Procedures

OSP will inform PIs/PDs of the institution's policy on RCR during NSF proposal preparation and at the time of award. When preparing NSF budgets, each line item that represents payment to a student/scholar for conducting research will be marked as subject to RCR requirements. Award budgets will be similarly

marked.

PIs/PDs will inform students/scholars subject to the requirements that they need to successfully complete the RCR training course on the CITI training site. PIs/PDs will ensure training is completed prior to payments being processed by OSP. Instructions for logging into the CITI site and registering for the course are available on the OSP website. A passing score of 80% is required to earn a training certificate.

When students/scholars successfully pass the course a certificate is created, which they should forward to their PI/PD for their information. Students/scholars are encouraged to retain a copy for their own records.

The CITI site automatically e-mails certificates to the administrative contact (Secretary) in OSP. Therefore, PIs/PDs are not required to provide a copy to OSP when they submit payroll or requisition forms. The OSP Secretary will save each certificate in a dedicated folder on the office server (G Drive) using the following naming convention: student last name_first name_certificate date_course title.

OSP will not process payroll or stipend payments for an individual who is subject to the requirements until a certificate of successful completion is received by OSP.

Payroll Processing

When the Payroll Manager receives an appointment form for a student/scholar whose position is subject to RCR requirements, the manager will search the RCR folder on the server for a certificate of successful completion for the individual. If a certificate is not in place, the manager will contact the PI/PD so they may work with the student/scholar to complete the training. If a certificate is in place, the manager will write a note on the appointment form that the RCR requirement has been met.

Stipend Processing

When Post Award receives a participant stipend request form for a student/scholar to conduct research on an NSF award, they will search the RCR folder on the server for a certificate of successful completion. If a certificate is not in place, Post Award will contact the PI/PD so they may work with the individual to complete the training. If a certificate is in place, post award will check the box on the form indicating NSF RCR training is completed.

Exemption and Waiver Processing

PIs/PDs may request that payroll lines for students/scholars who would not be conducting research receive an exemption from the RCR training requirements during the creation of a proposal budget or after an NSF grant has been awarded, but prior to any students/scholars engaging in grant-supported research activity. Requests should be made in writing to the attention of the RF Operations Manager and should include the budget justification supporting a solely administrative or non-research related role for the position. If granted, the exemption status will be recorded on the internal proposal and award budgets.

PIs/PDs may request a waiver for a student/scholar who is subject to the requirements if the individual has previously taken RCR training through CITI or an equivalent training program through another institution. Written requests should be directed to the RF Operations Manager and must include documentary evidence from the other institution, along with an explanation as to why it should satisfy SUNY New Paltz's requirements. The RF Operations Manager may consult as necessary with the Provost if equivalency is not immediately apparent.

Annual Reporting

The RF Operations Manager will prepare an annual report by September 1 and based on the prior fiscal year on the operationalization of the plan. At a minimum, the report is to include statistics on completion rates, effectiveness of procedures, and recommendations for improvement.