



Policy on Responsible Conduct of Research (RCR) Training for NSF-Sponsored Research and other federal programs as mandated

To ensure that the training of future scientists and researchers in the United States incorporates appropriate efforts to provide education in the responsible and ethical conduct of research, Section 7009 of the America Creating Opportunities to Meaningfully Promote Excellence in Technology, Education, and Science (COMPETES) Act mandates that beginning on January 4, 2010, “each institution that applies for financial assistance from the [National Science] Foundation for science or 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.”

NSF’s implementation of Section 7009 of the America COMPETES Act (<http://www.nsf.gov/bfa/dias/policy/rcr.jsp>) requires the following “Institutional Responsibilities”:

- a) An institution must have a plan in place 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. As noted in the NSF “Grant Proposal Guide” (Chapter II.C.1e), institutional certification to this effect is required.
- b) While training plans are not required to be included in proposals submitted to NSF, institutions are advised that they are subject to review, upon request.
- c) An institution must designate one or more persons to oversee compliance with the RCR training requirement.
- d) Institutions are responsible for verifying that undergraduate students, graduate students, and postdoctoral researchers supported by NSF to conduct research have received training in the responsible conduct of research.

Similarly, NIH requires that 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 must receive instruction in responsible conduct of research. This policy took effect with all new and renewal applications submitted on or after January 25, 2010, and for all continuation (Type 5) applications with deadlines on or after January 1, 2011. The notice 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. 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.

Claremont McKenna College endorses this effort to properly prepare students and other researchers for engagement in responsible and ethical conduct in research and has, under the auspices of the CMC Office of Sponsored Research, enacted the following policy to meet this goal and to comply with NSF, NIH and other federal programs' with RCR compliance regulations.

The policy applies to all faculty, students, and postdoctoral researchers participating in Claremont McKenna College's federally sponsored research and projects for which responsible conduct of research training is required.

In order to prepare students, postdoctoral researchers and other participants as responsible and ethical researchers, Claremont McKenna College requires that all Principal Investigators submit a detailed RCR Training Plan to the Office of Sponsored Research prior to the submission of a grant proposal to any agency requiring such training. The RCR Training Plan must specify, at minimum, the content, duration, and the delivery method of the training that will meet the specific needs of that research project. The Office of Sponsored Research and the Principal Investigator will together determine whether the training program sufficiently meets the requirements of the granting agency and adequately provides both initial training and ongoing mentorship with respect to RCR issues, including but not limited to: authorship and publication practices, peer review, stewardship of data, lab procedures, examples of research misconduct, conflicts of interest, IRB issues, policies if appropriate regarding human subjects including informed consent and animal welfare. Mentors should also provide insights regarding proper mentor/trainee relationships and collaboration.

In the Office of Sponsored Research, and on the OSR webpage <http://www.claremontmckenna.edu/research/forms/>, documents pertaining to the Responsible Conduct of Research are available for consultation.

PIs, students and postdoctoral researchers and other participants working on an NSF, NIH or other federally sponsored program that requires RCR training must complete a CMC Responsible Conduct of Research Training Certification indicating they have successfully completed RCR training before grant funds can be drawn down. This form is available in the Office of Sponsored Research or can be accessed at <http://www.claremontmckenna.edu/research/forms/>. The form must be signed and submitted to the Office, which will maintain appropriate files for documentation and audit purposes. PIs are encouraged to document ongoing RCR training efforts throughout award period. .