William Paterson University

Policy and Procedures on Training Certification in the Responsible Conduct of Research by Recipients and Participants in Externally Sponsored Research

William Paterson University (WP) joins the National Science Foundation (NSF) and the National Institutes of Health (NIH) in embracing the ethical position that "the responsible and ethical conduct of research (RCR) 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. The [America Creating Opportunities to Meaningfully Promote Excellence in Technology, Education, and Science] COMPETES Act focuses public attention on the importance of the national research community's enduring commitment and broader efforts to provide RCR training as an integral part of the preparation and long-term professional development of current and future generations of scientists and engineers." (Federal Register Volume 74, Number 160 (Thursday, August 20, 2009), Pages 42126-42128. Section 7009 of the America Creating Opportunities to Meaningfully Promote Excellence in Technology, Education, and Science (COMPETES) Act (42 U.S.C. 18620-1))

In response to The COMPETES Act, the NSF requires RCR training for undergraduate students, graduate students, and postdoctoral researchers participating in the proposed research project, (see http://www.nsf.gov/bfa/dias/policy/rcr.jsp) and the NIH requires training for 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. (see http://grants1.nih.gov/grants/guide/notice-files/NOT-OD-10-019.html)

Certification Requirement

WP requires that all investigators, undergraduate students, graduate students, and postdoctoral researchers, fellows and scholars participating in an eligible project funded by the NSF or the NIH to provide certification that they have completed training in the responsible conduct of research within 30 days of the receipt of the award, within 30 days of receiving appointment to participate in the award, or within 30 days of receiving notice of this requirement unless another date is specified in the notice.

Providing Certification of RCR Training

Certification of training will be provided to the WP Office of Sponsored Programs (OSP) by either (1) completing the WP approved RCR course (see instructions below) or (2) submitting certification indicating completion of RCR training at another institution for review and acceptance by the OSP. For both types of certification, if the training program includes modules for different science disciplines or roles in the research endeavor, OSP will assess whether an appropriate module was completed.

Providing certification of RCR training is required only one time regardless of the number of awards that the individual is engaged in or what their role in those awards may be. However, WP reserves the right to require additional training when it appears warranted or if the module the individual completed is sufficiently different from a new role in the research enterprise or they are engaged in research in a sufficiently different science discipline.

For NIH-supported projects, investigators are expected to have formal, scheduled bi-annual meetings with those who are involved in the project to discuss RCR-related issues pertinent to the project, and to provide documentation of the agenda and attendance of such meetings to the OSP.

Types of Sponsored Projects That Are Affected by This Policy

This policy applies to any project that provides direct financial assistance to undergraduate students, graduate students, postdoctoral researchers, trainees, fellows and scholars to engage in research activities whether or not the central intent of the project is research.

If the central intent of the project is not research, and undergraduate or graduate students are not engaged in research, individuals associated with the project are exempt from this policy.

If the central intent of the project is not research but provides support to students to engage in research with faculty as one of its components, the senior investigators associated with the project, the faculty that are supervising students (whether or not they are named in the award) and the students engaged in research must complete RCR training. Students in this type of project who are not engaged in research are not required to complete RCR training.

Identification of Individuals Required to Provide Certification

Proposal: All senior investigators engaged in a project at the time that a proposal is submitted to the NSF are specifically identified and, unless their role and involvement in the project is formally changed at the outset to that project, will be expected to provide certification. All of these individuals will be expected to complete or provide certification within 30 days of either the start date of the project or the date notification was received, whichever is later. Collaborating institutions will provide certification that they are in compliance with the sponsor's RCR requirements in the subrecipient contract.

After the Award: The Principal Investigator is required to (a) include notification of this requirement in all appointment or award letters specifically noting the 30-day requirement based on the date of the appointment or letter, and (b) to provide a copy of this letter to the OSP. This requirement exists for the duration of the award.

Monitoring of Certification

The OSP will maintain a database that will include at least the names of all individuals who are required to provide certification of RCR training, the date the certification was received, and the date of meetings of NIH-sponsored projects as well as a paper file with all of the certifications that are received.

When the OSP receives notification that an individual is required to provide certification, it will send that individual an email confirming that certification must be received by a specific date.

Penalty for Not Providing Certification

If an individual's certification is not received by the required date, the individual as well as the senior investigators engaged in the project will be notified that that the individual is (a) barred from all involvement in the project until certification is received during a grace period of 30 days, including the suspension of wages or release time, and then (b) removed from the project at the end of the grace period. If the individual is a senior investigator, the OSP will meet with the Principal Investigator, Department Chair, and/or Dean of the College to initiate the investigator's removal from the project. Providing proof of certification will be required before re-appointment to the project after this 30-day grace period.

If the information related to NIH-sponsored meetings is not received, WP will not authorize the submission of financial reports, requests for funds, progress reports or other items requested or required by the NIH.

WP Approved RCR Training Course

WP has selected the Collaborative Institutional Training Initiate (CITI) Course in the Responsible Conduct of Research because it provides modules that are appropriate for different research disciplines as well as modules for use by individuals who are supporting research endeavors. This program was also selected because it is part of suite of training programs already used by WP, which primarily includes the Human Subjects Research Educational Program, and because this program provides a certification notice to both the individual who complete the course and the OSP.

The RCR Course modules include Biomedical Sciences, Social and Behavioral Sciences, Physical Sciences, Students and Investigators in the Humanities, Science Administrators, Engineers, and Health Information and Privacy Security (HIPS).

The CITI Course in the Responsible Conduct of Research can be accessed here: www.citiprogram.org. Register* as part of the William Paterson University Community and then select the appropriate RCR Course for you to complete. Everyone taking the Course must obtain a score of at least 85% to pass. Certification of completion will be provided to both the completer as well as the Office of Sponsored Programs. Contact the OSP if there are problems accessing or using the CITI Program.

(* If someone registered and completed the CITI Program in the Use of Human Subjects in Research, they should use the same login information. Contact the OSP if you need your username or to reset a password.)