National Science Foundation Responsible Conduct in Research Education Plan

Background
The America COMPETES Act, signed into law in 2007, mandates training in the Responsible Conduct of Research (RCR). As a result, the National Science Foundation (NSF) began requiring institutions to certify that they have an RCR plan and outline the training for individuals paid by NSF grants. This certification was effective for proposals submitted on or after January 4, 2010.

Wake Forest University requires RCR education for all undergraduate students, graduate students, and postdoctoral researchers paid by NSF grants submitted on or after January 4, 2010. The types of activities, outlined below, depend on the status of the individual. NSF policy exempts individuals paid by conference, symposium, workshop, or travel grants. Principal Investigators (PIs) are responsible for ensuring that all research group members participate in the appropriate programs as required.

Please note that the CITI RCR course differs from the CITI Human Subjects Research training course. Completing the CITI RCR course does not satisfy the requirements for individuals working on research involving human subjects. Likewise, completing the CITI Human Subjects Research training course does not satisfy the RCR education requirements.

Undergraduate Students
Applicability: All undergraduates paid on an hourly basis to assist faculty in their laboratories working on NSF-funded research projects, including those who are paid through a Research Experience for Undergraduates (REU) supplement during the summer, must complete an RCR education program. PIs may also require that undergraduate research fellows in their laboratories complete the RCR program.

Undergraduates meeting the criteria above should complete the on-line CITI RCR course within 30 days of beginning to work on the grant. The modules required are discipline-specific: Biomedical Research, Social and Behavioral Research, Physical Sciences, and Arts and Humanities. Since most NSF PIs at WFU are in the Biology, Chemistry, and Physics Departments, most students will complete the Physical Sciences module.

In addition to the on-line course, students are expected to attend a 2-hour workshop offered during the spring or summer semester. The workshop must be completed within the first year of grant-funded research. Students may not charge the time used to complete the training to the NSF grant, but PIs may use discretionary funds to pay for it.

If an undergraduate beginning work on an NSF grant does not complete on-line training within 60 days, all previous and future salary charges will be transferred to the PI’s discretionary funds.

Graduate Students
Applicability: NSF Graduate Research Fellows, graduate students paid on an hourly basis by an NSF grant or who have an NSF-supported assistantship must complete an RCR education program.

Graduate students meeting the criteria above are required to participate in one 2-hour workshop that will be offered each semester. They must also complete the on-line CITI course in RCR within 30 days of beginning work on the grant. The modules required are discipline-specific: Biomedical Research, Social and Behavioral Research, Physical Sciences, and Arts and Humanities. Since most NSF PIs at WFU are in the Biology, Chemistry, and Physics Departments, most students will complete the Physical Sciences module.
Graduate students who have completed GRAD707 or GRAD708 must still complete the on-line CITI course in RCR but are not required to participate in the 2-hour workshop.

If a graduate student beginning work on an NSF grant does not complete on-line training within 60 days, all previous and future salary charges will be transferred to the PI’s discretionary funds.

**Postdoctoral Researchers**

*Applicability:* Postdoctoral researchers who are paid in full or in part by NSF grant funds must complete the on-line CITI RCR course within 30 days of beginning work on the grant. In addition, they are encouraged to attend the *Introduction to the Responsible Conduct of Research* workshop offered at Wake Forest Baptist Health or the 2-hour workshop for graduate students. This training should be supplemented through interactions with the PI as required by the postdoctoral researcher’s mentoring plan.

If a postdoctoral researcher beginning work on an NSF grant does not complete on-line training within 60 days, all previous and future salary charges will be transferred to the PI’s discretionary funds.

**Responsibilities**

**Principal Investigator:**
- Tell undergraduates, graduate students, and postdoctoral researchers paid by an NSF grant about the RCR education requirements and ensure they complete them
- Ensure that the on-line CITI RCR course is completed within the first 30 days that a student or postdoc begins work on an NSF grant
- Lead by example; set standards in the laboratory

**Office of Research and Sponsored Programs:**
- Certify to the existence of a RCR Education plan on NSF proposals
- Maintain the RCR education plan and RCR webpage
- Keep a list of students, staff, and/or faculty who complete the CITI RCR course
- Regularly receive a list from Payroll of individuals paid by NSF grants who are subject to RCR education requirements; compare this list to the list of those who have completed the various programs
- Certify at proposal submission that subawardee institutions have appropriate RCR education plans
- Ensure that the RCR education requirement is included in all subawards, including those to international institutions, as appropriate
- Cover half the cost of the 2-hour sessions for undergraduate and graduate students

**Graduate School:**
- Cover half the cost of the 2-hour RCR workshop for graduate students each year

**Undergraduate Research and Creative Activities Center:**
- Offer and provide funding of the 2-hour session in RCR each summer
- Disseminate RCR training requirements to faculty whose students will receive undergraduate research fellowships
- Through the workshop facilitator, provide a list of attendees to ORSP

Revised 2/3/14
Financial and Accounting Services:
  • Will initiate the cost transfer of unallowable salaries when the required training is not completed

References
National Science Foundation website:  http://www.nsf.gov/bfa/dias/policy/rcr.jsp