

UAF Policy 10.07.001

Original Adoption: June 8, 2010

Revised: NA

Responsible Chancellor's Cabinet Member: Vice Chancellor for Research

Responsible Department/Office: Office of Research Integrity



Responsible Conduct of Research (RCR) Training Policy

POLICY STATEMENT

To foster and promote ethical decision making, professionalism, and best practices, the University of Alaska Fairbanks (UAF) requires that everyone engaged in research understand and abide by fundamental ethical principles for the responsible conduct of research (RCR). If required by a sponsor, it is the responsibility of the principal investigator to ensure that project personnel complete UAF approved RCR training.

BACKGROUND & JUSTIFICATION

New scientists have traditionally been trained by scientists already well established in a particular discipline. This approach has worked well; however, the need for public accountability and the increasingly complex research environment now require that trainees learn skills not consistently conveyed through mentorship or in traditional educational settings. Mentoring will always be the cornerstone for training scientists but methods and opportunities must be expanded to foster the responsible conduct of research and improve ethical decision making skills.

Since 2000 RCR training programs have been discussed by federal research sponsors and by other organizations supporting higher education in the United States. The first sponsor to require RCR training was the National Institutes of Health (NIH). More recently, the U.S. Congress mandated RCR training for National Science Foundation (NSF) supported trainees as part of the America COMPETES Act. As of January 4, 2010, NSF began requiring proposing institutions to certify that they have a plan to provide RCR training and oversight to NSF supported research trainees.

Topic areas for RCR training can vary depending upon discipline and the trainee's career level (undergraduate student vs. post-doctoral researcher); however, the following topics are commonly included in comprehensive programs:

- Data Acquisition, Management, Sharing and Ownership
- Conflict of Interest and Commitment
- Research Misconduct
- Publication Practices and Responsible Authorship
- Peer Review
- Mentor / Trainee Responsibilities
- Collaborative Science
- Human Subject Protections*
- Animal Welfare*

** Irrespective of discipline, a basic understanding of the ethical principles applied to research involving humans or animals is expected of all scientists. Individuals engaged in research involving human subject participation or animal subjects require substantially more training than what is offered in a typical RCR training program.*

DEFINITIONS

Office of Grants and Contracts Administration: The UAF office responsible for negotiating terms and conditions, accepting awards on behalf of UAF, setting up award funds/accounts, and ensuring compliance with award terms and conditions. This office deals mainly with financial/fiscal compliance and sponsor reporting requirements, but also works closely with ORI to ensure funded activities comply with non-financial requirements.

Office of Research Integrity (ORI): The UAF office responsible for ensuring compliance with internal policies, sponsor requirements, and with local, state and federal regulations governing the conduct of research. This office deals mainly with non-financial compliance issues related to the responsible conduct of research.

Office of Sponsored Programs (OSP): The UAF office responsible for pre-submission review and authorization of proposals. The OSP director serves as the authorized organizational representative (AOR) and signatory official for UAF proposals.

Principal Investigator: Only individuals meeting the requirements of UAF Policy No. 05-003 Principal Investigator Eligibility may serve as principal investigators.

Responsible Conduct of Research (RCR) Training: This is a general term used to encompass a range of topics associated with research ethics, ethical decision making, professionalism, and best practices.

Trainee: This term refers to project personnel who are undergraduate students, graduate students, or postdoctoral researchers. This definition is consistent with the NSF usage of the term in its implementation of the RCR training requirements of the America COMPETES Act.

REFERENCES RELIED UPON

1. [Ethics Education and Scientific and Engineering Research: What's Been Learned? What Should Be Done? Summary of a workshop.](http://www.nap.edu/catalog/12695.html) <http://www.nap.edu/catalog/12695.html>
2. [Public Law 110-69 America Competes Act, SEC. 7009. Responsible Conduct of Research.](http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=110_cong_bills&docid=f:h2272enr.txt.pdf) http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=110_cong_bills&docid=f:h2272enr.txt.pdf
3. [Federal Register Notice announcing NSF's final implementation published on August 20, 2009.](http://edocket.access.gpo.gov/2009/E9-19930.htm) <http://edocket.access.gpo.gov/2009/E9-19930.htm>
4. National Science Foundation, [Proposal and Award Policies and Procedures Guide, January 2010.](http://www.nsf.gov/pubs/policydocs/pappguide/nsf10_1/nsf10_1.pdf) http://www.nsf.gov/pubs/policydocs/pappguide/nsf10_1/nsf10_1.pdf
5. [Office of Research Integrity, Department of Health and Human Services, Responsible Conduct of Research.](http://ori.dhhs.gov/education/) <http://ori.dhhs.gov/education/>
6. [National Institutes of Health Update on the Requirement for Instruction in the Responsible Conduct of Research.](http://grants.nih.gov/grants/guide/notice-files/NOT-OD-10-019.html) <http://grants.nih.gov/grants/guide/notice-files/NOT-OD-10-019.html>

7. [National Postdoctoral Association Responsible Conduct of Research Toolkit](http://www.nationalpostdoc.org/rcr-toolkit).
<http://www.nationalpostdoc.org/rcr-toolkit>

RESPONSIBILITIES

Principal Investigators shall:

1. properly educate and mentor trainees;
2. encourage all project personnel to participate in UAF sponsored RCR training programs;
3. address RCR training as required in the funding solicitation, request for proposal, announcement, or other agency instructions;
4. ensure that any RCR training requirements set by funding agencies or sponsors are met by:
 - a. providing all trainees with a copy of this policy and inform them that they must complete the RCR training set by the Vice Chancellor for Research (VCR); and
 - b. provide ORI with a list of trainees with their roles in the project; and
 - c. inform ORI whenever new trainees are identified.

Trainees shall:

1. enroll and complete the required RCR training activities within the designated timeframe.

The Office of Research Integrity (ORI) shall:

1. establish a tiered RCR training program for project personnel, based on training or career level;
2. develop and maintain RCR training activities and tools to support this program;
3. maintain attendance and completion records for authorized RCR training activities;
4. work with the Office of Sponsored Programs and Office of Grants and Contracts Administration to develop internal processes and procedures to ensure:
 - a. all awards with an RCR training requirement are identified;
 - b. principal investigators are notified of the RCR training requirements and completion timelines; and
 - c. periodic monitoring is performed to ensure continuing compliance with internal and external requirements throughout the life of the award;
5. review all requests to waive or modify training requirements or to substitute non-UAF courses or workshops; final approval or denial of such requests is at the discretion of the ORI Director.

NON-COMPLIANCE

Noncompliance with the terms and conditions of an award can lead to disciplinary action by the university, notification of the sponsor, and, if applicable, suspension or termination of funded activities. Any disciplinary action taken by the university will follow the employment rules governing the individual's employment category. Students are governed by the Student Code of Conduct as described in Board of Regents' Policy, Part IX – Student Affairs, Chapter 09.02 - Student Rights and Responsibilities.

EXCEPTIONS

There are no exceptions to this policy.

PROCEDURES

The VCR is the designated institutional official charged with the development and implementation of procedures to provide training and oversight in the responsible and ethical conduct of research at UAF. RCR training needs at UAF are accommodated through programs authorized and tracked by the UAF Office of Research Integrity. Non-UAF persons participating in research funded through this institution will be required to complete our training program or document completion of an equivalent training program from another university.

POLICY APPROVED BY:



Brian D. Rogers, Chancellor
University of Alaska Fairbanks

Signed: June 8, 2010