

Responsible Conduct of Research Policy

Date of Current Revision: January 22, 2024

Primary Responsible Officer: Vincenzo Cassella, Director, OSRP



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Policy Title:	Responsible Conduct of Research	Revised Date(s):	
Policy Type:	☐ Board ☒ Administrative ☐ Academic ☐ Student ☐ Other: _____	Contact:	Vincenzo Cassella, Director, Office of Sponsored Research and Programs

Policy Statement

The Office of Sponsored Research & Programs (OSRP) and the Research Ethics & Compliance Committee (RECC) are designated as the units responsible for overseeing institutional compliance with Responsible Conduct of Research (RCR) educational requirements. The Director of OSRP serves as Campbell University's point of contact and works with the university's RCR Coordinator as an intermediary with the RECC.

Purpose:	As an institution of higher education involved in research activities, Campbell University (CU) is accountable to the research and university communities to ensure the ethical and safe conduct of research. Federal statutes and policies, including Section 7009 of the American COMPETES ACT of 2007 for National Science Foundation, The Responsible and Ethical Conduct of Research at the USDA and NOT-OD-10-019 and NOT-OD-22-055 for National Institute of Health require funded grants to provide mentoring and training in the RCR. Responsible Conduct of Research (RCR) is broadly defined as the application of best practices in the proposing, performing, or reviewing research, or in reporting research results regardless of the scientific or scholarly discipline. RCR encompasses responsible and ethical conduct of research and of research compliance. The latter is comprised of complying with all applicable laws, regulations and policies governing research, including but not limited to human subjects, use of animals in research, export control, conflict of interest (personal, professional, and financial), and safe laboratory practices as examples. The NIH defines RCR (https://grants.nih.gov/grants/guide/notice-files/NOT-OD-10-019.html) as "the practice of scientific investigation with integrity. It involves the awareness and application of established professional norms and ethical principles in the performance of all activities related to scientific research." Instruction in responsible conduct of research or RCR training has emerged as the vehicle to provide researchers in biomedical, behavioral, and clinical sciences across the research career lifespan (undergraduate, graduate, post-doctoral, staff, and faculty) with foundational knowledge on institutional policies, best research practices, and in fostering a culture of research integrity. While there is emphasis on RCR training as meeting requirements associated with institutions' obligations to federal funding agencies (NIH and NSF as examples), RCR training is seen as beneficial to all individuals engaged in research regardless of funding. The purpose of this policy is to comply with federal RCR requirements and advance a culture of responsible and ethical research by promoting excellence in research.
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	This policy, and the parallel establishment of the Research Ethics & Compliance Committee by the Office of the Vice President for Academic Affairs & Provost, recognizes that creating a culture of responsible and ethical research is in line with CU's mission statement by promoting excellence in research.
Procedure:	All members of the CU community are expected to adhere to the highest ethical and professional standards as they pursue research and scholarly activities. CU requires the vigilance of all members engaged in research and scholarly endeavors to comply with the legal, regulatory, and ethical requirements established by the University, regulatory agencies, funding agencies, and professional organizations. The following topics are generally accepted components of RCR: • Authorship and Publication • Collaborative Research • Conflicts of Interest • Data Management • Mentor/Trainee Responsibilities • Peer Review • Research Misconduct • Human Subjects • Animal Welfare • Safe Laboratory Practices These categories are broad, and information regarding compliance expectations for each, as described below, can be provided in multiple ways. This policy recognizes the need for RCR instruction to have flexibility in content and delivery methods to address the needs, issues, and concerns across various target audiences as well as numerous disciplines. RCR training may use a combination of programming including the online Collaborative Institutional Learning Initiative (CITI) training and in-person instruction. All programming follows funding agency requirements. ROLES & RESPONSIBILITIES CU faculty and staff engaged in research are responsible for undergraduate, graduate, and post-doctoral trainees working on their projects and must determine the avenues by which trainees receive RCR training regardless of the funding source. If training is required by a sponsor those requirements will take precedent. OFFICE OF SPONSORED RESEARCH AND PROGRAM (OSRP) Programming: OSRP is responsible for providing clear and concise instructions on how the Campbell University community can create a CITI Program (https://about.citiprogram.org/) account and complete CITI Program RCR modules. Accounts are free to all Campbell faculty, staff, and students. Users must select "Campbell University" as their home institution. Instructions on how to create a CITI Program account are located on the OSRP website (https://www.campbell.edu/about/leadership/provost/sponsored-research-

[programs/policies-procedures-and-guidelines/](#)).

Monitoring: OSRP is responsible for monitoring compliance with federal requirements, verifying that all training requirements are met, maintaining training records, assisting in removing unallowable salary charges from grants for individuals who do not meet the training requirements, and transmitting RCR requirements to sub-recipients as necessary for awards.

Communication: OSRP communicates any new requirements via policy revisions and the OSRP website to the research community and makes the community aware of their current requirements.

RESEARCH ETHICS AND COMPLIANCE COMMITTEE (RECC)

RECC is responsible for guiding the development and implementation of the RCR training through the CITI Program and any other in-person training deemed necessary by the Vice President for Academic Affairs & Provost.

RECC is responsible for advising OSRP and the Vice President for Academic Affairs & Provost on any revisions to the RCR training requirements for all trainees, fellows, participants, and scholars participating on awarded grants.

RECC advocates and promotes a culture of RCR across the university.

PRINCIPAL INVESTIGATORS (PI)

Identification: PIs are responsible for identifying those on their research projects who should receive RCR training. This may include undergraduate, graduate, post-doctoral students, key personnel, staff, or themselves. The RCR training includes live training (i.e., classroom, in-lab, live webinar, classroom instruction, or virtual meeting) and online training (i.e., CITI). *If external funding is involved the agency's guidelines take precedence (see External Funding Requirements below).*

AUTHORIZED ORGANIZATIONAL REPRESENTATIVE (AOR)

Certification: The AOR certifies with each proposal and award that CU has a plan in place to provide appropriate training and oversight in RCR as required by external funding agencies.

SUBRECIPIENTS

When a subrecipient entity does not have an RCR policy, CU's RCR Policy applies.

EXTERNAL FUNDING REQUIREMENTS

As stated above, RCR training is a requirement for certain funding agencies. The United States Department of Agriculture (USDA), National Science Foundation (NSF) and National Institutes of Health (NIH) training grants all have RCR requirements.

PRINCIPAL INVESTIGATORS, KEY PERSONNEL, AND STAFF – (NSF)

The NSF requires that Principal Investigators (PI), key personnel and staff working on NSF funded projects receive RCR training. For the purposes of this policy, any person paid from an NSF award is considered to be working on the project and must receive RCR training.

PIs are required to certify with their proposal that they have a training plan in place to ensure all key personnel and staff working on their projects receive RCR training and that their plan is subject to review upon OSRP or NSF request.

The PIs are notified of their required training by OSRP upon receipt of award. The PIs have the responsibility to identify all other personnel requiring training including students. The CITI online training meets the requirements along with organic training occurring during the award.

If additional personnel work on the project, the PI must notify OSRP before or as soon as they begin work.

Once notified, PIs and all key personnel must complete the training within 30 days of working on the project. The training does not expire and needs only to be taken once. Students have different time requirements mentioned below.

UNDERGRADUATE, GRADUATE, AND POST-DOCTORAL TRAINEES (USDA, NSF, NIH-TRAINING)

All undergraduate, graduate, and post-doctoral researchers (trainees) supported by these grants must receive training in the responsible conduct of research.

This goal is achieved by completing the requirements for RCR Training through a combination of both formal and informal RCR training. Both of these training methods must be accompanied by discussion-based interaction between the trainees and the PI or other senior personnel.

OSRP is responsible for monitoring trainee participation and ensuring compliance. If a PI fails to comply with the requirements, the Vice President for Academic Affairs & Provost or a designee may set training requirements for the trainee. If trainees fail to participate in the training the Vice President for Academic Affairs & Provost may remove them from the grant.

RCR training is to be taken at least once during each career stage, and at a frequency of no less than once every four years.

All training must be completed within one year of beginning research on the award.

If a trainee leaves CU before the one-year deadline and has not at a minimum completed the online RCR training (i.e., CITI course), all salary charges will be removed from the award and charged to a non-sponsored account.

It is the PI's responsibility to ensure that RCR training is completed.

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Scope:	All Campbell University personnel and students
Exclusions:	To the extent that any external sponsor's standards are more stringent than this Policy, the sponsor's requirements will take precedence.
Enforcement:	The Office of Sponsored Research and Programs and the Campbell University Research, Ethics and Compliance Committee are responsible for the enforcement of this policy.
Publication:	https://cufind.campbell.edu/university_policies
Duration:	This policy remains in effect until further notice.
Review Period:	The Director of Sponsored Research and Programs and the Campbell University Research, Ethics and Compliance Committee shall oversee this policy and review it at least once every year and as necessary.
Definitions:	N/A

SACSCOC:	Standard 13.5
Accreditation:	SACSCOC Standard 13.5
Related Forms, Policies, or Tools:	1. National Institute of Health Notice: NOT-OD-10-019 (https://grants.nih.gov/grants/guide/notice-files/NOT-OD-10-019.html) 2. CITI Program (https://about.citiprogram.org/) 3. Campbell University Office of Sponsored Research and Programs Forms and Policies (https://www.campbell.edu/about/leadership/provost/sponsored-research-programs/policies-procedures-and-guidelines/)

To determine approval level, please consult your respective Vice President.

Reviewed By:	Research Ethics and Compliance Committee	Title:		Date:	11/01/2023 11/14/2023
	Borree Kwok				11/07/2023 11/20/2023
	Gina Calabro				01/04/2024
Approved By:	Michael L. Adams	Title:	Vice President for Academic Affairs & Provost	Date:	01/05/2024
	Executive Cabinet				01/22/2024
Last Updated By:	Name	Title:	Title	Date:	Date

Keywords (up to 8):	
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