

Lehigh University

RESPONSIBLE CONDUCT OF RESEARCH TRAINING PLAN

I. Summary

Effective January 1, 2010, all undergraduate and graduate research assistants, post-doctoral researchers, and principal investigators receiving external research funding from NSF and NIH must undergo Responsible Conduct of Research (RCR) Training via the Collaborative Institutional Training Initiative (CITI) web-based, self-contained training course. For the purpose of this Plan, responsible conduct of research is defined 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.

II. Reason for Plan

Lehigh University believes that training in the responsible conduct of research is an essential component of higher education and an important element in the implementation of Lehigh's Strategic Plan to increase research opportunities at the University.

As of January 4, 2010, the National Science Foundation (NSF) implemented the *America Competes Act* which stipulates that each institution that applies for NSF funding must "...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." [Federal Register, Vol. 74, No. 160, p. 42126].

For any NIH training, career development award (individual or institutional), research education grant, and dissertation research grant, the National Institutes of Health (NIH) enacted a similar policy for all new and renewal applications for these awards submitted after January 25, 2010. NIH requires that all trainees, fellows, participants, and scholars receiving support through through these awards must receive instruction in responsible conduct of research. This policy will take 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 [NIH Notice of update to NIH Policy NOT-OD-10-019]. Find out more about the comprehensive NIH requirements at <http://www.lehigh.edu/~inors/RCR.html>.

III. Those Affected by the Plan

This plan pertains to the following individuals, when supported by NSF or NIH funding:

- Undergraduate Students
- Graduate Students
- Post-doctoral Researchers
- Principal Investigators

Lehigh's Office of the Vice President and Associate Provost for Research and Graduate Studies requires RCR training within their discipline category for all undergraduate and graduate students and post-doctoral researchers supported on new or continued NSF or NIH research grants received as a result of proposals submitted after January 4, 2010. This training must be successfully completed and certified within 30 days of the individual's start date on the research project.

Online training via the CITI program is required unless a student or postdoctoral researcher has taken an equivalent course previously and can provide appropriate documentation verifying successful completion of the RCR training.

IV. Procedures and Responsibilities

- 1. On-line Training in RCR:** Lehigh will keep a current subscription to CITI and provide access to CITI training modules for Lehigh students and post-doctoral researchers without charge. CITI training is available at <http://www.citiprogram.org>. New users must register online and associate themselves with Lehigh University before beginning the training. The student or postdoctoral research is responsible to successfully complete the training within 30 days of the individual's start date on any research project.
- 2. Notification of PI:** The Office of Research and Sponsored Programs (ORSP) will notify the Principal Investigator (PI) of the requirement for the documentation of the RCR training via the Award Requirements documentation.
- 3. PI Responsibilities:**
 - a. The PI is responsible to ensure that the RCR training requirement via the online CITI program is specified in the offer letter for any student or post-doctoral researcher being hired for a position under the affected research project.
 - b. Undergraduate students who are appointed to the research project must also be informed of the RCR training requirement.
 - c. The PI is responsible to complete the on-line RCR training.
 - d. The PI is responsible to ensure that informal instruction occurs throughout the research training experience. Multiple approaches can be used to continue the instruction (reviewing articles, discussing case studies from the CITI program, etc.).
 - e. The PI is responsible to ensure that the students and postdoctoral researchers are aware of the university's policies on conflict of interest,

human and animal subjects in research, laboratory practices, research misconduct.

- 4. Tracking and Recording:** ORSP will track and record names, start dates, and RCR training completion dates of all affected students and postdoctoral researchers when payroll authorizations are processed. Copies of certifications for all students who successfully complete RCR training will be retained in the appropriate ORSP project file. Certifications are also available via the CITI website.
- 5. Time to Complete Training:** We estimate that the online CITI program should take between 1 ½ to 3 hours to complete. While each discipline and type of research emphasizes different aspects of ethical training, there are core topics essential for all researchers, including:
 - a. Responsible Authorship and Publication
 - b. Collaborative Research
 - c. Data Acquisition and Management
 - d. Conflict of Interest
 - e. Mentoring
 - f. Research Misconduct
 - g. Peer Review

Modules covering research with human subjects and animals will be required only if required by Lehigh's IRB and IACUC.

RCR TRAINING THROUGH THE CITI PROGRAM MUST BE COMPLETED WITHIN 30 DAYS OF ANY STUDENT OR POST-DOCTORAL RESEARCHER'S START DATE ON THE PROJECT.

V. Consequences for Noncompliance

Consequences for failing to complete RCR training in a timely manner may include:

- Discontinuance from participation on the funded research project
- Transfer of salary and related expenditures from the grant account to a departmental or other institutional account.
- If a failure is noted during a future audit, the appropriate salary and related expenditures will be moved from the grant to an institutional account. In addition, the finding may cause an expanded audit and require the University to pay penalties.

VI. Related documents and forms

Sample offer letter from Controller's document with the RCR statement included.

VII. Where you can find more information

Questions regarding RCR Training or the CITI training should be directed to your Contracts and Grants Specialist in ORSP.

VIII. Oversight and Contacts

Oversight of the Responsible Conduct of Research Training is a responsibility shared by the PI and the University, to be coordinated by the ORSP within the Vice President and Associate Provost for Research and Graduate Studies office.

Contact: Thomas J. Meicheid
 Director, Office of Research and Sponsored Programs
 (610) 758-3021
 Email: inors@lehigh.edu

SAMPLE LETTER OF APPOINTMENT FOR RESEARCH ASSISTANT
(see highlighted section required for RCR plan)

Dear XXXXXX:

I am pleased to offer you a full-time _____ Research Assistantship in the College of XXXXX for the period _____ to _____. Please be aware that this award is only for this period and there is not assurance of additional awards in future years.

The stipend for this position is a total of \$XX,XXX or \$XXX per pay. The stipend is paid in equal semi-monthly installments from which appropriate federal, state and local taxes are deducted. Upon submission of all appropriate documentation, the first payment will be made on September 15, 20XX and your final pay will be May 31, 20XX.

Your responsibilities as a _____ will require up to 20 hours per week. You also must be registered as a full-time Lehigh graduate student. And, as you know, the work associated with this stipend is required of all candidates for your _____ degree. Per our discussion, your primary responsibility will be to

You are responsible for completing the on-line course Responsible Conduct in Research (RCR) at the following website: CITIProgram.org. You will be required to register and associate your registration with Lehigh University. The course will take approximately 1.5 to 3 hours to complete and must be completed 30 days after the first day of your research assistantship.

You should be aware that you are only considered a full-time student if you are taking 9 or more credits per semester or if your advisor certifies you as such if you are taking a practicum or internship. To ensure that you can devote sufficient time and effort to your academic studies, you are not eligible for any other assistantships and may not seek additional employment inside or outside the University without the approval of the Dean of the College of XXXX.

If you accept this offer, please sign the enclosed copy of this letter. Retain the original for your files and return the other to me by XXXXXXXXXX.

Sincerely,

XXXXX

Signature

Date

Social Security Number

cc: Payroll Office