 LEHIGH UNIVERSITY	POLICY: Responsible Conduct of Research Training Plan Responsible Office: Office of Research and Sponsored Programs			
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I. Policy Statement

This policy establishes the requirement for all undergraduate and graduate research assistants, post-doctoral researchers, and principal investigators receiving external research funding from NSF and NIH to undergo Responsible Conduct of Research (RCR) training within their discipline category via the Collaborative Institutional Training Initiative (CITI) web-based, self-contained training course. For the purpose of this policy, 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.

This policy applies to the following individuals, when supported by NSF or NIH funding received as a result of proposals submitted after January 4, 2010:

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

RCR training must be successfully completed within 30 days of the individual's start date on the research project.

II. Reason for Policy and Underlying Principles

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 these awards must receive instruction in responsible conduct of research. [NIH Notice of update to NIH Policy NOT-OD-10-019]. Find out more about the comprehensive NIH requirements at <https://research.cc.lehigh.edu/RCR>.

III. Definitions

Term	Definition
Responsible Conduct of Research	The practice of scientific investigation with integrity.


IV. Procedures

1. Online Training in RCR

Lehigh maintains a current subscription to CITI and provides access to CITI training modules for Lehigh students, post-doctoral researchers, and faculty 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, postdoctoral researcher, or faculty member is responsible for successfully completing the training within 30 days of the individual's start date on any research project.

2. Notification of PI

ORSP will notify the Principal Investigator (PI) of the requirement for the documentation of the RCR training via the Award Requirements documentation.

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3. PI Responsibilities

Oversight of RCR is a responsibility shared by the PI and the University, coordinated by ORSP. The PI is responsible for the following:

- 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 online RCR training, unless they have completed it previously for another project.
- 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 additional 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


6. Renewal

When an undergraduate, graduate student, or post-doctoral researcher's status changes (e.g. from undergraduate to graduate, from graduate to post-doctoral researcher, or from post-doctoral Researcher to faculty member), the individual must re-take the RCR CITI course for their discipline category in order meet the requirements for their new status. Faculty members are not required to re-take the RCR CITI course once they have initially completed it for a new or continued NSF or NIH research grant received as a result of proposal submitted after January 4, 2010.

7. 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.

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- 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.

V. Special Situations/Exceptions

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

VI. Contacts


Subject Matter	Office Name	Telephone Number	E-mail/Web Address
Policy clarification and interpretation Requests for exceptions to this policy	Assistant Vice President, Office of Research and Sponsored Programs	(610) 758-3019	cjk418@lehigh.edu
RCR requirements for specific proposals or awards	Assigned ORSP Grants and Contracts Specialist	(610)758-3021	https://research.cc.lehigh.edu/contact-orsp

VII. Web Address for This Policy

<https://research.cc.lehigh.edu/policies>

VIII. Revision History

Date of revision	Summary of revisions	Revised by
23-Jan-2013		T. Meicheid
11-Jan-2018	Renewal requirements added to the Procedures section to clarify that in order to meet NIH and NSF requirements, students and post-doctoral researchers are required to re-take RCR training at each career stage. Conversion to updated research administration policy template. Editorial revisions for clarity.	N. Coll

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IX. Appendix

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 XXXXXXXXX.

Sincerely,

XXXXX

Signature

Date

Social Security Number

cc: Payroll Office