

STANDARD ADMINISTRATIVE PROCEDURE

15.99.99.M0.04 **Responsible Conduct of Research**

Approved August 4, 2020

Next scheduled review: August 4, 2025

SAP Statement

The responsible and ethical conduct of research is critical for excellence as well as for maintaining public trust in research. It is the goal of Texas A&M University to promote a university-wide environment of responsible conduct of research (RCR), and to ensure that individuals subject to federal responsible conduct in research requirements complete responsible conduct of research training. Education and training in the ethical and responsible conduct of research are integral elements of research for all undergraduate students, graduate students, and postdoctoral researchers who engage in research in any field or who pursue advanced degrees at University facilities.

Reason for SAP

The purpose of this SAP is to provide guidance on the minimum responsible conduct of research training requirements for compliance with federal requirements where individuals are supported by the National Science Foundation (NSF), National Institutes of Health (NIH), and United States Department of Agriculture (USDA) National Institute of Food and Agriculture (NIFA), and to establish University requirements for the training of students and postdoctoral researchers involved in University-related research, regardless of funding.

Definitions

Responsible Conduct of Research: Generally, the rules, regulations, and best practices established to guide research and scholarly activities in order to produce results that are honest, accurate, efficient, and objective.

Researcher: an individual/employee who conducts research, whether funded or unfunded. For the purposes of this SAP, this term includes, but is not limited to, undergraduate students, graduate students, and postdoctoral researchers.

- **University-Related Research**: includes both internally and externally funded research activities.

- Internally funded research: research that is not funded via an agreement with a sponsor, but is instead funded through internal sources. This type of research funding does not involve Sponsored Research Services in the administration of these research activities and includes competitively awarded internal proposal programs such as X-Grants, T3, RDF grants, etc., as well as other internal sources that may or may not be restricted to research.
- Externally funded research:
 - Sponsored Research: funded activities, including cost-sharing as described in 15.01.01.M1.03 *Cost Sharing Procedures*, in which a formal agreement (e.g., a grant, contract, or cooperative agreement) is entered into by the University and a sponsor or sponsors. These activities generally have a defined scope of work, require detailed financial accountability (e.g., detailed budget, regular financial reporting and audit, return of unexpended funds at end of project), and deliverables.
 - Research gifts: funding from an external sponsor (donor) who expects nothing of significant value in return, other than recognition and disposition of the gift in accordance with the donor's wishes. Gifts may be accompanied by an agreement that restricts the use of the funds to a particular purpose. Beyond that, no contractual requirements are imposed (beyond the requirements of responsible stewardship) and there are no "deliverables" to the donor (i.e., no rights to tangible or intellectual property). There is no formal fiscal accountability to the donor beyond periodic progress reports and summary reports of expenditures.

Principal Investigator: The individual responsible for the administrative and programmatic aspects of a University-related research project.

Core Training: Training offered by the Division of Research (DOR) which includes certain core research topics, as listed on the DOR website at <https://vpr.tamu.edu/manage-research/responsible-conduct-of-research>. These topics are viewed as essential components of RCR training and provide fundamental knowledge, fostering an environment of research integrity.

Supplemental Training: other face-to-face and/or online courses not included in the Core Training. Supplemental training includes fundamental knowledge geared towards a subset of research fields.

Official SAP/ Responsibilities/ Process

1. Background
 - 1.1. Recipients of awards from the National Science Foundation (NSF), the United States Department of Agriculture (USDA) National Institute of Food and Agriculture (NIFA), and the National Institutes of Health (NIH) are required to comply with specific requirements to ensure appropriate training in the responsible conduct of research as follows:

- 1.1.1. National Science Foundation (NSF): The 2007 America COMPETES Act directed the National Science Foundation (NSF) to require that all funded students and postdoctoral researchers undergo training in the responsible conduct of research. The implementation of this requirement became effective with all NSF awards (including continuations) received on or after January 4, 2010. All undergraduate students, graduate students, and postdoctoral researchers "who will be supported by National Science Foundation (NSF) to conduct research" must complete the Collaborative Institutional Training Initiative (CITI) RCR training.
- 1.1.2. United States Department of Agriculture (USDA) National Institute of Food and Agriculture (NIFA): mandates that program directors, faculty, undergraduate students, graduate students, postdoctoral researchers, and any staff participating in the research project receive appropriate training and oversight in the responsible and ethical conduct of research. The requirement may be met by completing the CITI RCR training.
- 1.1.3. National Institutes of Health (NIH): NIH requires that all Institutional Research Training Grants, Individual Fellowship Awards, Career Development Awards (institutional and individual), Research Education Grants, Dissertation Research Grants, or other grant programs with a training component include a plan for how the researcher will carry out instruction in responsible conduct of research. All trainees, fellows, participants, and scholars receiving support are required to complete RCR training. Instruction should include face-to-face discussions (online, such as CITI RCR training, can be a component, but is not sufficient). Substantial face-to-face discussion, combination of didactic and small-group discussions (e.g. case studies), and participation of research training faculty members in instruction are highly encouraged, with a minimum of eight total hours recommended. Instructions must be undertaken at least once during each career stage (undergraduate, post-baccalaureate, predoctoral, and postdoctoral), but no less than once every four years.

2. General

- 2.1. A university wide environment pertaining to responsible conduct of research requires researchers to have the knowledge, skills, and tools to allow them to be responsible for their research conduct. Knowledge areas depending on research focus may include topics such as authorship, plagiarism, peer review, human subjects protections, animal welfare, clinical practice, data acquisition, management, sharing and ownership, conflict of interest, collaborative research, export controls, research expenditures, and research misconduct, among others.
- 2.2. CITI RCR training covers many of the core research topics. The strengths of the CITI RCR training include providing individuals with broad exposure to important areas of ethics and serving as a good informational resource for future reference. Face-to-face training is meant to build and expand on the core research topics, and fosters an environment for group discussion and interaction. Face-to-face training is designed to provide regular reminders of responsible research as well as to promote a deeper understanding of scholarly ethics so that individuals integrate

ethical decision-making into daily scholarly activities. For those students unable to attend in-person face-to-face training, sessions utilizing interactive video conferencing platforms will be made available.

- 2.3. A catalogue of current training opportunities can be found at <https://vpr.tamu.edu/manage-research/responsible-conduct-of-research>.

3. General Responsibilities

- 3.1. The Conflict of Interest and Responsible Conduct of Research Office (COI/RCR) is responsible for providing and monitoring training through the online Collaborative Institutional Training Initiative (CITI) Program, as well as other university/system training modules. In addition, the DOR provides workshops oriented towards undergraduate and graduate students, as well as postdoctoral researchers.
- 3.2. The **College** is responsible for ensuring that students and postdoctoral researchers are compliant with the training requirements. The PI supports the College in this effort when the research is funded through PI specific research grants.
- 3.3. The **Principal Investigator (PI)**, with the support of the College and COI/RCR, is responsible for assisting the COI/RCR in ensuring that students and postdoctoral researchers supported on their University-related research projects are compliant with training requirements and that records are shared with their College and the COI/RCR as applicable.
- 3.4. **Undergraduate students**
 - 3.4.1. All undergraduate students who are participating in internally funded research, gift-funded research, or externally funded sponsored research must complete the CITI RCR training within 60 days from their initial involvement in the research activity unless required earlier.
- 3.5. **Graduate students**
 - 3.5.1. Internally funded research, gift-funded research, or participation in research activities: Graduate students participating in research funded internally or by research gifts (including all courses for which research is an integral element, such as honors thesis, master's thesis, or doctoral dissertation) must complete the CITI RCR training within 60 days from commencement of the research activity unless required earlier.
 - 3.5.2. Externally funded research: graduate students participating in externally funded research must complete the CITI RCR training within 60 days following receipt of such support unless required earlier. In addition, each graduate student must complete four hours of face-to-face Core training within the first six months of his or her involvement in externally funded research unless required earlier.
- 3.6. **Postdoctoral researchers** must complete the CITI RCR training within 60 days of employment, regardless of their source of funding. In addition, each postdoctoral researcher must complete an additional four hours of face-to-face Core training within the first six months of his or her employment unless required earlier.

4. Supplemental Trainings

- 4.1. Supplemental trainings are intended to complement the Core training offerings and should be customized based on the requirements of and/or applicability to the research to be undertaken by the students or postdoctoral researcher. It is important to note that some of the trainings, such as human subjects, laboratory and biosafety, and animal welfare, must be successfully completed prior to engaging in certain types of research activities.
5. **Monitoring Requirements**
 - 5.1. The COI/RCR will work directly with students and postdoctoral researchers to ensure compliance with this SAP. The COI/RCR will track online and workshop training completions, and will send a report of these completions to each College for review and appropriate action, if needed. The College is responsible for updating the report, as needed and returning the report to the COI/RCR.
6. **Enforcement**
 - 6.1. The VPR will work with the Colleges to resolve any issues of non-compliance. As necessary, the VPR will be authorized to suspend University research privileges for non-compliance with Federal, State, System, and/or University policies and regulations. Any questions regarding exceptions and re-instatement of privileges must be sent in writing to the Vice President for Research.
 - 6.2. In order to promote compliance with this SAP, any student or postdoctoral researcher supported by external grant funds who fails to satisfactorily complete the required CITI RCR training within 60 days and/or the additional four hour requirement of face-to-face training within the designated period shall be removed from the externally funded sponsored research project. Reinstatement on the project (or employment) is strictly conditional on satisfactory completion of the training requirements detailed in this SAP.

Related Statutes, Policies, or Requirements

<https://grants.nih.gov/grants/guide/notice-files/NOT-OD-10-019.html>

<https://www.nsf.gov/bfa/dias/policy/rcr.jsp>

<https://nifa.usda.gov/responsible-and-ethical-conduct-research>

Contact Office

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