

Office of Sponsored Programs

Responsible Conduct of Research (RCR) Policy

Policy ID: OSP 0002

Date: 5/17/21

Status: Approved

Policy Type: Public

Issuing Office: Office of Sponsored Programs

Responsible Executive: Provost

Affected Parties: Liberty University faculty and staff receiving external funding in the form of sponsored programs.

Reason for Policy: The purpose of this policy is to comply with federal requirements for undergraduate students, graduate students, and postdoctoral researchers to receive training in the responsible and ethical conduct of research. This policy may also apply to industry partners working collaboratively with PIs in federally sponsored research.

Policy Statement: [P.L 110-69-America COMPETES Act](#), [NIH Notice Number NOT-OD-10-019](#) and [USDA/NIFA Research Terms and Conditions](#)

Section 7009 of the America COMPETES Act requires an institution applying for and receiving grant funds from the National Science Foundation (NSF) to “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.” Additionally, the National Institutes of Health (NIH) requires certain grant applicants to provide a responsible conduct of research training plan, and the U.S. Department of Agriculture/National Institute of Food and Agriculture (USDA/NIFA) requires training in the responsible and ethical conduct of research. The requirements currently apply only to NSF, USDA/NIFA, and certain NIH grant applications; individuals applying for grants from other federal, state, and/or private agencies should follow the guidelines of the respective agency.

Procedures:

1. Principal Investigators (PIs) are responsible for providing RCR training to undergraduate students, graduate students, and/or postdoctoral fellows covered by this policy within a reasonable period of time after grant funding is awarded.
2. PIs will provide training in accordance with federal agency requirements using the Collaborative Institutional Training Initiative (CITI) Program. Liberty University subscribes to CITI which provides self-paced online courses on the Responsible Conduct of Research. PIs should direct their trainee(s) to complete the course most applicable to the proposed research project.

3. PIs must send verification of training to the Office of Sponsored Programs within one month of completion. Any questions related to Citi Training should be directed at the LU Research Ethics office.

Certifications

- Principal Investigator (PI) – Prior to submitting a research grant involving populations in training, the PI and co-PIs (if applicable) should confirm that they will conduct RCR training with all student and/or postdoctoral researchers according to LU's approved plan.
- Authorized Organizational Representative (AOR) – In compliance with the NSF's policy, the AOR will certify in the grant proposal that the institution has met the RCR training requirement, and that the PI and co-PIs have completed their required certification.

Records

The Office of Sponsored Programs will maintain documentation of the RCR training on each grant funded project for no less than three (3) years following the end of the grant period, unless otherwise directed by the funding agency.

Sanctions: Sponsored agreements funded with public money (federal, state and local government awards; subcontracts under government prime grants and contracts) are subject to full review of all project activity (program and financial) by auditors. All project activities must comply with sponsor terms and conditions and with all applicable regulations.

Exclusions: None

Review Cycle: Every two years or as needed. All OSP policies will be reviewed by the Director of the Office of Sponsored Programs, with input from the following departments as needed: Finance, Legal, Human Resources and the Graduate School. The Provost will approve all OSP policies.

Glossary of Terms: Responsible Conduct of Research (RCR) – The National Institutes of Health defines RCR as “the practice of scientific investigation with integrity.” It “involves the awareness and application of established professional norms and ethical principals in the performance of all activities related to scientific research.”

Responsible Conduct of Research (RCR) Training – RCR training consists of instruction in the following nine (9) instructional areas, as identified by the Office of Research Integrity of the U.S. Department of Health and Human Services:

1. Data acquisition, management, sharing and ownership,
2. Conflict of interest and commitment,
3. Human subjects,

4. Animal welfare,
5. Research misconduct,
6. Publication practices and responsible authorship,
7. Mentor/trainee responsibilities,
8. Peer review, and
9. Collaborative science.