

Responsible Conduct of Research (RCR) Training for Federal Awards: Policy and Procedures

POLICY

In order to comply with the National Science Foundation's (NSF) and National Institutes of Health's (NIH) requirements for training in Responsible Conduct of Research (RCR), Bard College requires that those principal investigators, collaborating faculty, postdoctoral researchers, students (undergraduates and graduates), and staff who are working on an NSF- or NIH-funded grant will complete RCR training.

The Office of Institutional Support tracks the completion of all RCR training. Faculty, students, and staff working on NSF- or NIH-funded grants must have RCR training on file with our office.

BACKGROUND

Bard College has a responsibility as the steward of institutional resources, which includes public (federal, state, or local government) and private funds, to ensure that all funded activities reflect the College's primary mission of scholarly inquiry and education. As such, Bard must comply with all Sponsor requirements.

The NSF and NIH require that institutions ensure that all principal investigators, collaborating faculty, postdoctoral researchers, students (undergraduates and graduates), and staff who are working on an NSF- or NIH-funded grant will obtain RCR training.

COVERED BY THIS POLICY

This policy pertains to all Bard College principal investigators, collaborating faculty, postdoctoral researchers, students (undergraduates and graduates), and staff who are working on an NSF- or NIH-funded grant, *whether they are financially compensated or not*.

Note: Other Sponsors may have RCR training requirements which differ from NSF or NIH requirements. In these instances, the principal investigator must contact their Program Chair to develop a RCR training program to ensure compliance.

DEFINITIONS

Responsible Conduct of Research: 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. Areas of training include, but are not limited to: animal welfare, collaborative research, conflict of interest, data management, human subjects research, mentoring, peer review, research misconduct, and responsible publication and authorship. The following modules are required in the RCR training:

- Collaborative Research
- Conflict of Interest
- Data Management
- Financial Responsibility
- Mentoring

Other optional modules are available and may be required by specific funding organizations.

PROCEDURES

To ensure that Bard is complying, all principal investigators, collaborating faculty, postdoctoral researchers, students (undergraduates and graduates), and staff who are working on an NSF- or NIH-funded grant must provide proof of completion of a RCR training program. Bard will accept proof of completion of an RCR training program if the training was completed with the past three years.

All researchers should take the RCR training before beginning any research activities. Ideally, researchers should complete the training before creating research protocols.

Upon completing RCR training, email a copy of your certificate to ois@bard.edu. *Principal investigators are responsible for gathering and submitting certificates of all researchers working on their grants.*

Bard currently offers RCR training through the CITI Program suite of online training sessions. Instructions on how to log into CITI Program can be found in Appendix A: Instructions on How to Use CITI Programs.

RELEVANT REGULATIONS

- National Science Foundation (NSF) RCR Regulations: [NSF Proposal & Award Policies and Procedures Guide \(2019\), Chapter IX.B](#)
- America Creating Opportunities to Meaningfully Promote Excellence in Technology, Education, and Science (COMPETES) Act: 42 U.S.C. 1862o-1; Section 7009

APPENDIX A: Instructions on How to Use CITI Programs

Instructions for CITI Program RCR Training:

1. Go to the external-based website www.citiprogram.org
2. If you have already used CITI for any training (even at another institution), use your existing username and password, and select “Add a course...” from your homepage (see #7 below).
3. If you have not used CITI before, click on the “Register” Link on the home page
4. Select “Bard College” from the drop-down list of Participating Institutions in Step 1.
5. It is recommended that your username be a combination of your first and last name (for example, johnsmith or jsmith), or another username that is easy to remember.
6. Use your Bard email address as the preferred email address.
7. Once you are logged-in, select “Add a Course”
8. For Question #3 click on “Researchers and Staff”. For Questions 1, 2, and 4, you can click on “Not at this time”. Then scroll to the bottom of the page and hit “Submit”.
9. After hitting Submit, the site will bring you to a page with your courses. Click on “Start now” to begin.
10. Lastly, the trainings have “Required” and “Supplemental” Modules. The Supplemental modules are presented to offer you more information in areas you may find interesting or that may be related to your research; you are not required to take these modules.

If you have taken CITI RCR training at another institution, follow these instructions to transfer your completion credit to Bard:

1. Go to the external-based website www.citiprogram.org
2. If you have previously completed course work through CITI program while at another institution, you may transfer your completed work to Bard.
3. Log-on as a registered user.
4. Once you are on the Main Page, select the red link “Affiliate with another Institution.”
5. Select “Bard College” from the drop-down list of Participating Institutions.
6. Once you have completed your affiliation with Bard on the CITI program website, email your Department Chair and the Office of Institutional Support to let them know you have already completed the training at another institution and you have now affiliated it with Bard College.