

RESPONSIBLE CONDUCT OF RESEARCH (RCR) ADMINISTRATOR WORKSHOP: FOSTERING INTEGRITY THROUGH EFFECTIVE EDUCATION

[2025 RCR Administrator Workshop](#)

RCR Public Plan Administrative Guidelines

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Definitions:

Public Plan: Agency policy elements (to meet requirements) See below

Institutional Program: All non-policy elements (RCR Program Description)

1. Name of Institution and Division/Office Coordinating Responsible (and Ethical) Conduct of Research (RCR) Program. [Name of institution and Office]

2. Name of Institutional RCR Coordinator. [Name of RCR Coordinator]

3. Background/Purpose

a. Background - Federal agencies encourage ethics education, which may include specific topics to address (see References). Several federal research sponsors have a specific requirement, to provide Responsible Conduct of Research (RCR), also termed by the NSF as "Responsible and Ethical Conduct of Research (RECR)," for individuals supported on such sponsored research, including the National Science Foundation (NSF), the National Institutes of Health (NIH), and the U.S. Department of Agriculture's National Institute of Food and Agriculture (USDA-NIFA) (so for USDA, it is specific to this one USDA agency [NIFA]).² In addition, our institution [requires/encourages] all individuals engaged in research to receive RCR education.

b. Purpose - The purpose of this document is to outline the elements of [our institution's] RCR Plan to comply with Federal research sponsor RCR education requirements for affective individuals supported on NSF, USDA-NIFA, and NIH funds.

i. NSF has a specific requirement [see references] that the Authorized Organizational Representative (AOR) is "required to complete a certification that the institution has a plan to provide appropriate training and oversight in the responsible and ethical conduct of research to

¹ Links included in this document were active at the time of the document date.

² NSF states "Responsible and Ethical Conduct of Research (RECR);" NIH is "Responsible Conduct of Research (RCR);" USDA states "Responsible and Ethical Conduct of Research (RCR)."

undergraduate students, graduate students, postdoctoral scholars, faculty, and other senior/key personnel who will be supported by NSF to conduct research and that such training addresses mentor training and mentorship.” Further, “An institution must designate one or more persons to oversee compliance with the RECR training requirement” ([NSF: B2C](#)).

- ii. **USDA NIFA** states that³ “institutions that conduct USDA-funded extramural research must foster an atmosphere conducive to research integrity, bear primary responsibility for prevention and detection of research misconduct, and maintain and effectively communicate and train their staff regarding policies and procedures. ... the Authorized Representative (AR) assures, through acceptance of the award that the institution will comply with the above requirements. Award recipients shall, upon request, make available to NIFA the policies, procedures, and documentation to support the conduct of the training. Note that the training referred to herein shall be either on-campus or off-campus training. The general content of the ethics training will, at a minimum, emphasize three key areas of research ethics: authorship and plagiarism, data and research integration, and reporting misconduct.”
- iii. The **NIH** responsible conduct of research training requirement ([NOT-OD-10-019](#), updated in [NOT-OD-22-055](#)) applies to trainees, fellows, participants, and scholars receiving support through any NIH training, career development award (individual or institutional), research education grant, and dissertation research grant.⁴

The NIH stipulates that acceptable programs involve at least eight contact hours, involve research training faculty, and include an in-person component; online programs as the sole means of instruction are not acceptable. Further details of the requirements are described in the Notice of Funding Opportunities (NOFOs) and are summarized in (f) below.⁵

³ <https://www.nifa.usda.gov/grants/regulations-and-guidelines/research-misconduct/responsible-ethical-conduct-research>

⁴ This applies to the following programs: **International Research Training:** D43, D71, **Fellowships:** F05, F30, F31, F32, F33, F34, F37, F38 **Career Awards:** K01, K02, K05, K07, K08, K12, K18, K22, K23, K24, K25, K26, K30, K99/R00, KL1, KL2 **Research Awards:** R25, R36 **Institutional Research Training:** T15, T32, T34, T35, T36, T37, T90/R90, TL1, TU2 **International Cooperative Agreement:** U2R, and any other NIH-funded programs supporting research training, career development, or research education that require instruction in responsible conduct of research as stated in the relevant funding opportunity announcements.

⁵ Note: As of January 2025, the Ruth Kirchstein parent T32 NIH training grant applications will include adequacy of the RCR training plan in the impact score.

Note: [PHS Form 6349](#): Section IV requires institutions to name the individual: “Who is responsible for assuring that your institution fosters a research environment that promotes the responsible conduct of research and discourages research misconduct (93.300 (c))”? At some institutions this is the person with overall responsibility for administering the Responsible Conduct of Research (RCR) program.

4. **Scope and Affected Individuals** - The scope of this plan includes individuals supported on sponsored research from the NSF, USDA-NIFA, and NIH, including the RCR education of Faculty, Research Staff, and Graduate Students. Most institutions define “individuals supported” as those directly paid on NSF, USDA-NIFA and NIH sponsored funds; the NSF specifies a minimum funding level of one person-month. The “individuals supported” may imply that other individuals should be included who have an involvement in the sponsored research, regardless of funding level.
5. **Policy Statement**⁶ - In accordance with research sponsor requirements, the [Institution] is responsible to ensure individuals receive required Responsible Conduct of Research (RCR) education. Our Institution follows the federal agency mandates that individuals subject to federal responsible conduct of research requirements, including those obligations pursuant to subawards received from and sent to other institutions, complete training in research ethics. To foster an environment that promotes the responsible conduct of research and discourages research misconduct, all individuals engaged in research (e.g., faculty, research staff, students, and others) are encouraged to complete training regardless of funding source.
6. **Education Requirements** - Federal sponsors provide specific topics and other education requirements for individuals supported on sponsor funds.
 - a. [NIH](#): Requires at least eight hours of face-to-face discussion, no less than once every four years or at each career stage and which involves research training faculty. Subject specific training requirements include:
 - i. Conflict of interest personal, professional, and financial and conflict of commitment, in allocating time, effort, or other research resources
 - ii. policies regarding human subjects, live vertebrate animal subjects in research, and safe laboratory practices
 - iii. mentor/mentee responsibilities and relationships
 - iv. safe research environments (e.g., those that promote inclusion and are free of sexual, racial, ethnic, disability and other forms of discriminatory harassment)
 - v. collaborative research, including collaborations with industry and investigators and institutions in other countries

⁶ Example RCR Language is available from the University of New Hampshire, [University of New Hampshire, Responsible Conduct of Research & Scholarly Activity](https://www.unh.edu/research/research/complianceehs/responsible-conduct-research-scholarly-activity), <https://www.unh.edu/research/research/complianceehs/responsible-conduct-research-scholarly-activity>

- vi. peer review, including the responsibility for maintaining confidentiality and security in peer review
 - vii. data acquisition and analysis; laboratory tools (e.g., tools for analyzing data and creating or working with digital images); recordkeeping practices, including methods such as electronic laboratory notebooks
 - viii. secure and ethical data use; data confidentiality, management, sharing, and ownership
 - ix. research misconduct and policies for handling misconduct
 - x. responsible authorship and publication
 - xi. the scientist as a responsible member of society, contemporary ethical issues in biomedical research, and the environmental and societal impacts of scientific research.
- b. [NSF](#): NSF does not currently have mode or frequency requirements. Subject matter requirements include mentor training and mentorship. In addition, [CHIPS and Science](#) articulates two remaining curricular areas that have not yet been implemented. These include: 1) training to raise awareness of potential research security threats; and 2) Federal export control, disclosure, and reporting requirements.”
- c. [USDA NIFA](#): USDA NIFA does not currently have mode or frequency requirements. Subject matter requirements include 1) authorship and plagiarism, 2) data and research integration, and 3) reporting misconduct
- d. [OSTP](#): The research security training program shall (1) provide covered individuals with explicit examples of behaviors that have resulted in a known improper or illegal transfer of U.S. government-supported R&D in the context of the research environment, as described to the covered institution by federal research agencies; and (2) communicate to covered individuals the importance of U.S. researcher participation in global discoveries, including attracting foreign talent to U.S. research institutions, as a core principle of maintaining international leadership and national security.

- 7. Communication of Requirements:** Institutions utilize a variety of models to communicate RCR requirements based on their own institutional policies and practices:
- a. Automated alerts to Principal Investigators and those supported on grant funds, including information about the RCR training requirements for a new award and reminders that the RCR requirement has not been fulfilled.
 - b. Communicate to PIs that the training be completed during the time of the award.
 - c. Communications based on the timeline for completion articulated in their policy. This communication could be done through notice to the PI from Sponsored Programs or via data pulls by a central research office with standard notices on an identified frequency basis.

8. Timelines and Tracking

- a. **Completion Timeline** - In contrast to other compliance education requirements (e.g., IRB and IACUC), federal agencies encourage but do not require that RCR education be completed prior to individuals initiating research. A suggested guideline is that individuals complete the requirements within the first 90 days of being appointed to the federal funds, and no later than the first six months.⁷
- b. **Frequency and Continuing Education** - Institutions should consider RCR requirements as continuing professional education, which should be refreshed through academic career stages. For example, the NIH specifies that supported individuals refresh RCR education no less frequently than once every four years, or at each career stage; a suggested guideline is no less frequently than every three years and at education stages. In a NSF OIG audit, NSF identified as a promising practice requiring repeat RCR training on a regular basis, and stated, "A small number of universities required periodic RCR training, typically every three years, either as retraining or as a refresher, which is consistent with NIH guidance" (see 14.b.iii). Agencies do not generally consider prior-completion as sufficient; i.e., "I completed this 2 years ago at my former institution" but make no specific requirements and thus institutions may consider them on a case-by-case basis.
- c. **Tracking of Training** - The requirement for tracking RCR education completion by affected individuals varies among agencies. Institutions use different models for documenting their fulfillment, such as by:
 - i. Tracking some or all RCR requirements centrally;
 - ii. Tracking the RCR requirements separately for each agency (e.g., through rostered courses structured to meet NIH's requirements); or
 - iii. Obliging Principal Investigators to track completion.

Note: The NSF has a requirement that a designated individual be responsible for tracking fulfillment; i.e., "The institutions are responsible for verifying that the students and researchers supported by NSF to conduct research have received training in the responsible and ethical conduct of research" (see 14.b.iii).

9. **Subawards Received and Disseminated** - The RCR education requirements flow down from prime recipient institutions to subrecipient institutions. The [Institution's office] will ensure that RCR education requirements tied to subawards received are met. They should also ensure subrecipient institutions are informed of the RCR requirements.

10. **Ancillary Topics** - Federal sponsors can specify RCR-related topics to address, which may require their own separate plans.

- a. Required (as ancillary to RCR)

⁷ The requirements for Research Security education continue to evolve, including whether they should be considered as part of RCR requirements. The expected completion timeline for certain elements to be completed is at the point of hire.

- i. Rigor & Reproducibility (NIH)
- ii. Mentoring Plans & IDPs
 - 1. [NSF](#) Mentoring plans
 - 2. NSF IDPs
 - 3. [NIH Mentor Training Requirement](#)- January 2025
- iii. [10337 of CHIPS and Science](#) (possible future implementation)
 - 1. training to raise awareness of potential research security threats; and Federal export control, disclosure, and reporting Requirements.'
- b. Emerging
 - i. Open Science
 - ii. Social Responsibility
 - iii. Science Communication
 - iv. Use of Generative AI

11. Plan Review and Revision - This plan will be reviewed each academic year [by responsible individual role or office], and revised as necessary to ensure it meets current Federal sponsor requirements. These requirements may be institute or agency specific [see "Things to Watch" below].⁸

12. Exceptions - Federal agencies do not specify allowable exceptions to RCR education requirements. The [Institution Official] may consider limited exceptions on a case-by-case basis in specific circumstances of agency or institutional requirements.

13. Non-compliance: Institutions use a variety of means to address non-compliance of RCR education requirements. Models include:

- a. Assertive email follow-up alerts (e.g., for sponsored research projects at-risk of noncompliance, and of non-compliance)
- b. Including PIs and other leaders in email follow-up
- c. Require salary and fringe transfer for individuals who do not complete training to a non-sponsored departmental fund.
- d. Not granting approval for project-related compliance protocols (e.g., IRB, IACUC, or IRB).
- e. Putting on hold release of funds of awarded federal grants.

14. References

- a. Agency RCR Requirements
 - i. Department of Energy National Proposed Rulemaking on Conflict of Interest: <https://www.federalregister.gov/documents/2024/06/18/2024-13392/financial-assistance-regulations-conflict-of-interest-and-conflict-of-commitment-policy-requirements>

⁸ Federal agencies post periodic updates to RCR requirements online; see suggested resources under **References: Agency- Related Resources**

- ii. Office of Science and Technology Policy Guidelines for Research Security Programs at Covered Institutions:
<https://bidenwhitehouse.archives.gov/wp-content/uploads/2024/07/OSTP-RSP-Guidelines-Memo.pdf>
- iii. National Institutes of Health: <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-22-055.html>
<https://grants.nih.gov/grants/guide/notice-files/not-od-10-019.html>
- iv. National Science Foundation: <https://new.nsf.gov/policies/responsible-research-conduct>
- v. National Science Foundation, <https://new.nsf.gov/policies/pappg>
 - 1. The RCR and Research Security requirements are located in Part II: Award Administration and Monitoring of NSF Assistance Awards in IX: Recipient Standards. 2024 Requirements: <https://www.nsf.gov/policies/pappg/24-1/ch-9-recipient-standards>
 - 2. Draft NSF Proposal and Award Policies and Procedures Guide (26-1); https://www.nsf.gov/bfa/dias/policy/papp/pappg26_1/FedReg/draft_pappg_dec2024.pdf. See specifically Chapter IX, Section B (p. 150), “Responsible and Ethical Conduct of Research (RECR).”
- vi. United States Department of Agriculture National Institute of Food and Agriculture: <https://www.nifa.usda.gov/grants/regulations-and-guidelines/research-misconduct/responsible-ethical-conduct-research>
- vii. CHIPS and Science Act (RCR is identified in 10337; Research Security Training 10634: <https://www.congress.gov/117/plaws/publ167/PLAW-117publ167.pdf>
- b. Agency-Related Resources (for Requirement Updates)
 - i. **Office of Science Technology Policy (OSTP)**
 - 1. OSTP Research Security Program Guidelines: <https://bidenwhitehouse.archives.gov/wp-content/uploads/2024/07/OSTP-RSP-Guidelines-Memo.pdf>
 - ii. **National Institutes of Health (NIH)**
 - 1. The NIH Table of Contents: <https://grants.nih.gov/funding/subscribe.htm>
 - 2. NIH Extramural Nexus: <https://nexus.od.nih.gov/all/>
 - iii. **National Science Foundation (NSF)**
 - 1. NSF Audit of RCR Programs: https://oig.nsf.gov/sites/default/files/reports/2021-04/RCR_MIR_Final_7-25-17%20%281%29.pdf
 - iv. **National Academies of Science, Engineering, and Medicine (NASEM)**
 - 1. U.S. Science and Innovation Policy: <https://www.nationalacademies.org/policy/us-science-and-innovation-policy> (see “Events”)
 - 2. To sign up for newsletters: <https://www.nationalacademies.org/subscribe>

- v. **Council of Government Relations (COGR)**
 - 1. Visit www.cogr.edu to sign up for access to the COGR Member Portal. Please be sure to add 'administrator@cogr.edu' to your approved senders list & address book to help ensure you are receiving COGR's messages and can view links.
 - 2. COGR Research Security Program Summary: <https://www.cogr.edu/sites/default/files/Overview%20of%20OSTP%20Guidelines%20for%20Research%20Security%20Programs%20at%20Covered%20Institution%20clean%20copy%20july%2012%202024%20REVISED.pdf>
- vi. **National Council of University Research Administrators (NCURA)**
- vii. **CITI Program:** <https://about.citiprogram.org/>
- c. **Staying Informed**
 - i. **CITI Program:** <https://about.citiprogram.org/blog/>.
 - ii. **National Academies:** <https://www.nationalacademies.org/subscribe>
 - iii. **SECURE:** <https://www.secure-center.org/blank-8>
 - iv. **NIH:**
 - 1. The NIH Table of Contents: <https://grants.nih.gov/funding/subscribe.htm>
 - 2. NIH Extramural Nexus: <https://nexus.od.nih.gov/all/>
 - v. **Council of Government Relations (COGR):** Visit www.cogr.edu
 - vi. **Federal Demonstration Partnership (FDP):** <https://thefdp.org/> (click link on top right of this page to get list of listservs to join: Listserv Form: https://nas.qualtrics.com/jfe/form/SV_6JSpMiMrijPwoK2)
 - vii. **Association of Research Integrity Officers RCR Special Interest Group:** <https://www.ariohq.org/>
 - viii. **Online Ethics Community (OEC) Scholars, Educators, and Administrators Fostering Research Integrity (SEAFRI) Community of Practice (CoP):** <https://onlineethics.org/>
 - 1. Click on the Get Involved button at the top
 - 2. Under Open Access Membership, click on Join Now ~ New Membership
 - 3. Set up a profile and check the SEAFRI Community of Practice and check "yes" to having your membership displayed.
 - ix. **Association for Practical and Professional Ethics' Research Integrity Scholars and Educators:** <https://www.appe-ethics.org/>
 - x. **SRAI:** <https://www.srainternational.org/home>
 - xi. **ORI:** <https://ori.hhs.gov/>
 - xii. **UKRIO:** <https://ukrio.org/>
 - xiii. **Retraction Watch:** <https://retractionwatch.com/>

- xiv. **National Academies *Fostering Integrity in Research* report:**
<https://nap.nationalacademies.org/catalog/21896/fostering-integrity-in-research>
- xv. **World Conferences on Research Integrity (WCRI):**
<https://www.wcrif.org/>
- xvi. **Journals:** *Science, *Nature, *S&EE, *Accountability in Research, *PLOS
Ten Simple Rules Collection
- xvii. International & national codes of conduct,
- xviii. Professional societies' codes of conduct

Document History

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