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Georgia Tech's Responsible Conduct of Research Compliance Policy

Georgia Tech students and trainees engaged in research at the undergraduate, graduate and post-doctoral levels shall receive formal instruction in ethical considerations and decision-making in Responsible Conduct of Research that is appropriate for their disciplines and for the stages of their research careers. This policy is intended to comply with the requirements of the National Science Foundation's (NSF) implementation of the requirements of Section 7009 of the America Creating Opportunities to Meaningfully Promote Excellence in Technology, Education, and Science Act (42 U.S.C. 1862o-1) found in the NSF Award and Administration Guide, Chapter IV, and National Institutes of Health (NIH) requirements found in NOT-OD-10-019*.

Responsible Conduct of Research (RCR) is defined by NIH "...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."

The Georgia Institute of Technology's RCR Compliance Policy requires that students who participate in Georgia Tech's President's Undergraduate Research Award Program (PURA) and students or trainees receiving research funds or who participate in research activities funded by certain types of NIH or NSF awards (see Applicability, below)* shall engage in a program of study in the Responsible Conduct of Research that includes, at a minimum, the following elements:

- Conflicts of interest (personal, professional, and financial)
- Policies regarding the use of human subjects in research
- Policies regarding the use of vertebrate animals in research
- Laboratory safety, biohazard management, chemical safety, and polices regarding the use of radioisotopes and radiation sources in research
- The responsibilities and relationships of mentors and mentees
- Collaborative research
- The peer review process
- Data acquisition and laboratory tools; management, sharing and ownership of data and research tools
- Research misconduct and policies for handling research misconduct
- Authorship and publication
- Science and Engineering in Society: the scientist and engineer as responsible members of society and ethical issues in research and the environmental and societal impacts of scientific research

It is the responsibility of the Principal Investigators of NSF and NIH-funded projects (see Applicability below)* to ensure that all students engaged in research are informed of the requirement and that the requirement has been met. Moreover, it is the responsibility of the

Principal Investigator to provide mentoring in RCR through discussions of RCR topics and through oversight of students' research.

Applicability and Implementation:

This policy applies to all undergraduate students, graduate students, and post-doctoral trainees performing research, whether as an employee, GRA, or other trainee, on projects funded by NSF on or after January 4, 2010 and to students funded by or performing research funded by certain types of NIH awards (see Applicability below)*.

This policy shall apply to undergraduate students participating in the Georgia Tech PURA Program for the semester beginning August 2010 and thereafter. The Institute shall consider how to address RCR training needs of undergraduate students that are not currently covered by the Compliance Policy.

An academic policy is in place that addresses RCR training requirements for doctoral students but the academic policy for master's students has not been finalized. The implementation of an RCR graduation requirement for doctoral students began in the Fall of 2011.

[*NIH training, career development award (individual or institutional), research education grant, and dissertation research grant must receive instruction in responsible conduct of research. This applies to the following programs: D43, D71, F05, F30, F31, F32, F33, F34, F37, F38, K01, K02, K05, K07, K08, K12, K18, K22, K23, K24, K25, K26, K30, K99/R00, KL1, KL2, R25, R36, T15, T32, T34, T35, T36, T37, T90/R90, TL1, TU2, and U2R.]

Procedure:

- A. The PI for covered NSF and NIH proposals shall complete the RCR Addendum to the Proposal Routing sheet which shall become a part of the project file in the Office of Sponsored Programs. In the Addendum, the PI acknowledges the requirement for RCR training which is accomplished through a combination of Institute-wide online training that every covered student receives plus one or more of the in-person methods described below. The training requirement will be flagged "Yes" in the OSP Oracle Database under Research Ethics Training.
- B. All undergraduate students, graduate students and post-doctoral trainees paid in whole or in part from covered projects funded by NSF or covered projects funded by NIH shall meet the requirements for continuing instruction in the Responsible Conduct of Research in the following manner:
 1. Students and trainees shall complete a CITI RCR online course during the first semester in which they are appointed to a covered NSF or NIH-funded project. Students and trainees will be required to earn an acceptable score on the exam given as part of this instruction. Documentation will be provided to Georgia Tech by CITI and records will be maintained by the e-Commerce and Training Office in the Office of Sponsored Programs (OSP). Training must be completed within 90 days of appointment to a covered NSF or NIH-funded project or by the end of the semester, whichever is later; and

2. At the discretion of the School and Principal Investigator, students shall [ensuring a minimum of 4 in-person hours for NSF projects & a minimum of 8 in-person contact hours for applicable NIH projects plus any retraining/recertification requirements (See: <http://grants.nih.gov/grants/guide/notice-files/not-od-10-019.html>)], either:
 - a. Participate in a class, seminar, or other interactive approach developed by the School that address ethical issues relevant to the discipline as well as broader issues of research integrity; or
 - b. Participate in regularly scheduled laboratory meetings or discussions that address ethical issues relevant to the discipline as well as broader issues of research integrity; or
 - c. Successfully complete the Research Methods Course required by the School for all majors (provided that course includes at least eight hours of instruction in ethical issues relevant to the discipline as well as broader issues of research integrity); or
 - d. Successfully complete the Research Ethics Course (PHIL 6000) offered by the Ivan Allen College (for graduate students only); or
 - e. Participate in the Research Ethics Webinar offered at least two times per semester by OSP's e-Commerce Office.

Please Note: The in-person training methods listed above are meant to satisfy the GT RCR Compliance Policy. Not all of the in-person training options satisfy the GT RCR Academic Policy. Graduate students that meet the applicable criteria for the GT RCR Academic Policy should refer and comply with the [GT RCR Resources Website](http://www.rcr.gatech.edu/resources) (www.rcr.gatech.edu/resources) for more information.

3. At the discretion of the School and Principal Investigator, post-doctoral trainees shall [ensuring a minimum of 4 in-person hours for NSF projects & a minimum of 8 in-person contact hours for applicable NIH projects], either:
 - a. Participate in an interactive program developed by the School that addresses ethical issues relevant to the discipline as well as broader issues of research integrity; or
 - b. Participate in regularly scheduled laboratory meetings or discussions that address ethical issues relevant to the discipline as well as broader issues of research integrity; or
 - c. Participate in the Research Ethics Webinar offered at least two times per semester by OSP's e-Commerce Office.
 - d. Participate in the GT:IPS™ program

Compliance with the requirements for providing instruction in Responsible Conduct of Research is a responsibility of the Principal Investigator. The PI for each covered NSF and each covered NIH project will complete a form, the RCR Project Plan, at the time a proposal is submitted that indicates which instruction method beyond CITI will be used for students appointed to the project. The form will become part of the project file in the Office of Sponsored Programs. Documentation of the in-person RCR training that has been

completed to satisfy the Compliance Policy is the responsibility of the PI unless a formal tracking system is already in place (i.e., Banner). An Annual RCR Certification of the in-person training requirement will be via the OSP Deliverable System.

The Office of Grants & Contracts Accounting will prepare a report of students and trainees who are paid from NSF and covered NIH-funded projects each semester which will be matched against CITI records. Principal Investigators and Schools will be notified of any non-compliance.

Willful non-compliance on the part of any student shall result in termination of the student's funding and referral to the Dean of Students for appropriate disciplinary action. It is expected that the In-Person requirement will be met within the first year of an appointment.

- C. All students participating in Georgia Tech's PURA Program shall receive instruction in the Responsible Conduct of Research in the following manner:
 1. Students shall complete a CITI RCR online course when they enter the program. Students will be expected to earn an acceptable score on the exam given as part of this instruction. Documentation will be provided to Georgia Tech by CITI and records maintained by the Office of Sponsored Programs e-Commerce and Training Office; and
 2. Student researchers are encouraged to participate in one or more of the following [ensuring a minimum of 4 in-person hours]:
 - a. A seminar or other interactive program developed by the School that addresses ethical issues relevant to the discipline as well as broader issues of research integrity; Regularly scheduled laboratory meetings or discussions that address ethical issues relevant to the discipline as well as broader issues of research integrity;
 - b. The Research Ethics Webinar offered two times per semester by OSP's e-Commerce Office.