

VERMONT STATE COLLEGES SYSTEM

CHANCELLOR'S PROCEDURES FOR IMPLEMENTATION OF POLICY 435: *RESPONSIBLE AND ETHICAL CONDUCT OF RESEARCH*

I. PURPOSE

This policy is to promote and comply with requirements of certain federal sponsors (listed below) and to implement a Responsible Conduct of Research (RCR) training plan for certain individuals funded by these federal sponsors. The following procedures have been approved by the Chancellor pursuant to VSC Policy 435, *Externally Funded Research*.

II. PROCEDURES

A. National Science Foundation (NSF)

As required by the NSF, all personnel who conduct NSF-supported research must receive training in the responsible and ethical conduct of research (RECR). PIs, co-PIs, and anyone listed as key/senior personnel must also complete additional training on research security.

RECR Training Plan:

1. The PI will notify all students, faculty, senior personnel, and staff performing work on an NSF award that they must complete the RCR Basic Training Course offered through the Collaborative Institutional Training Initiative (CITI).
2. The PI will provide each institution's Office of Sponsored Programs (or equivalent office) with a list of students working on NSF awards. The Office of Sponsored Programs, or equivalent office, will notify the PI when each student has completed the RCR Basic Training Course. The office will also follow up with students who have not completed the course in a timely manner.
3. Students, faculty, and senior personnel are required to complete the training within one month of beginning work on the project.

More information about the RECR requirement can be found in the NSF [Proposal & Award Policies and Procedures Guide](#).

Research Security Training Plan and Certifications:

1. At time of submission, all senior personnel listed in the proposal must have completed the CITI training on research security within the prior 12 months.
2. As part of the submission, the institution's Authorized Organizational Representative (AOR) must certify that all individuals identified as senior/key personnel have completed the required research security training.
3. At the pre-award stage, all senior/key personnel listed in the proposal must certify that they are not party to a malign foreign talent recruitment program. The AOR must also certify that all senior/key personnel have complied with their responsibility to certify this.
4. At the post-award stage, anyone serving as a PI on an active award must certify annually via Research.gov that they are not participating in a Malign Foreign Talent Recruitment Program.
5. If an institution receives direct funding from NFS, it must annually report all current financial support, the value of which is \$50,000 or more, including gifts and contracts, received directly or indirectly from a foreign source which is associated with a foreign country of concern.

Safe and Inclusive Work Environments Plan (for off-site projects):

In addition to the RECR training plan above, all NSF proposals that include work off-site must develop a Safe and Inclusive Work Environments Plan specific to the project. Each plan should include the following:

1. A brief description of the field setting and the unique challenges for the team.
2. The steps the proposing organization will take to nurture an inclusive off-campus or off-site working environment, including processes to establish shared team definitions of roles, responsibilities, and culture; (e.g., codes of conduct, trainings, mento/mentee mechanisms, and field support that might include regular check-ins and/or developmental events).
3. Communication processes within the off-site team and to the organization(s) that minimize singular points within the communication pathway (e.g., there should not be a single person overseeing access to a single satellite phone).

4. The organizational mechanisms that will be used for reporting, responding to, and resolving issues of harassment if they arise.

See Research Safety Plan template.

More information about the Safe and Inclusive Work Environment requirement can be found in the NSF Proposal & Award Policies and Procedures Guide, [II.E.9](#).

B. National Institutes of Health (NIH)

The NIH requires that all trainees, fellows, participants, and scholars receiving support through any NIH training, career development award (individual or institutional), research education grant, and dissertation research grant receive training in the responsible conduct of research.

In addition, PIs, co-PIs, and anyone listed as key/senior personnel are required to complete additional training on research security.

RCR Training Plan:

As part of the application process, NIH requires that PIs include an RCR Training Plan in their proposals. The plan must address the following components:

1. **Format:** The NIH highly encourages RCR plans that incorporate substantial face-to-face discussions among the participants; a combination of didactic and small group discussions; and participation of research training faculty. Online courses from CITI can be a supplement to the RCR training, but NIH doesn't consider online courses adequate as the sole means of instruction.
2. **Faculty Participation:** Faculty are encouraged to contribute to formal and informal RCR instruction.
3. **Duration:** Instruction should consist of at least 8 contact hours between the students and the participating faculty.
4. **Frequency of Instruction:** RCR training should occur at every stage in a scientist's career, beginning at the undergraduate level.

The PI will oversee the required RCR training and will maintain records documenting that all NIH-funded trainees, participants, and scholars received training.

More information about the NIH RCR training requirements can be found in [NOT-OD-22-055](#).

Research Security Training Plan:

1. At time of submission, all senior personnel listed in the proposal must complete the CITI research security training on an annual basis. They must also certify annually via the Research Performance Progress Report that they have completed the training within the prior 12 months.
2. When a proposal is submitted, the institution's Authorized Organizational Representative (AOR) must certify that all individuals identified as senior/key personnel have completed the required research security training within 12 months prior to the submission.
3. At the time of proposal submission, all senior/key personnel listed in the proposal must certify that they are not party to a malign foreign talent recruitment program. The AOR must also certify that all senior/key personnel have complied with their responsibility to certify this.
4. Individuals serving as senior personnel on an active award must certify annually that they are not participating in a Malign Foreign Talent Recruitment Program. This is done as part of the Research Performance Progress Report.

C. National Institute for Food and Agriculture (NIFA)

NIFA requires 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. NIFA also requires that documentation of such training be maintained.

RCR Training Plan:

1. The PI will notify all NIFA-funded investigators, faculty, graduate students, undergraduate students, and staff that they must complete the RCR Basic Training Course offered through the Collaborative Institutional Training Initiative (CITI).
2. The PI will provide the institution's Office of Sponsored Programs, or equivalent office, with a list of these names. The Office of Sponsored Programs, or equivalent office, will notify the PI when each person has completed the RCR Basic Training Course. The office will also follow up with those who have not completed the course in a timely manner.

3. Students are required to complete the training within one month of beginning work on the project.

More information on the NIFA RCR requirement can be found in the [NIFA Regulations and Guidelines](#).



Chancellor