MEMORANDUM

TO: Faculty and Students Supported by NSF Grants
    Research Administrators

FROM: Randolph W. Hall

DATE: December 10, 2009

SUBJECT: Implementation of NSF Mandate for Training in Responsible Conduct of Research (RCR)

The responsible and ethical conduct of research constitutes important preparation for future scholars. To address this need, the National Science Foundation has implemented a new requirement that all students (undergraduate, graduate and postdoctoral) who are supported by NSF funding receive training in Responsible Conduct of Research (RCR), effective January 4, 2010.

The NSF has given universities some discretion in implementing this new requirement. After consulting the University Research Committee, as well as the Research Deans, the University has decided to implement the requirement in the following way:

- On-line training will be made available to all students, by January 31, 2010. The training covers nine basic modules, and can be completed in two to four hours.
- In the transition period, all currently funded NSF students must only complete the curriculum by the end of the spring semester.
- Thereafter, beginning in the summer, all newly hired students will be required to complete the training prior to hiring.
- Any current student who has not completed training by the end of the spring semester will not be hired in the summer or fall until the training has been completed.
- As the requirement is implemented, my office will survey affected students and faculty, to assess the effectiveness and quality of the training program, and make needed adjustments.

In addition to the on-line curriculum, schools have the opportunity to create their own equivalent classroom curriculum as a substitute. Classroom curriculum must cover at least the same nine modules as the on-line curriculum. In addition, the Center for Excellence in Research will offer a workshop on “Teaching Responsible Conduct of Research”, taught by Michael Quick and Kathryn Rich, and held on February 17, 12:00pm-2:00pm, in the Office of Research Advancement. This workshop will provide guidance for faculty on how to address RCR topics in their courses and in student mentoring.

The attached document provides more detail on the RCR requirement. On-line training will be available from the site below after January 31.

www.usc.edu/research/about/policies/responsible_conduct_of_research_rcr
Implementation of NSF Requirement for Responsible Conduct of Research (RCR) Training (December 10, 2009)

The responsible and ethical conduct of research constitutes important preparation for future scholars. To fulfill this need, the Office of Research Advancement will institute a training program for USC students in RCR, and make the program available to all undergraduates, graduate students and postdoctoral scholars.

Curriculum Requirements

The university curriculum in RCR will cover these topics:

1. Data Acquisition, management, sharing and ownership.
2. Conflicts of interest and commitment
3. Research Misconduct
4. Publication practices and responsible authorship
5. Mentor/trainee responsibilities
6. Peer review
7. Collaborative research
8. Human subjects
9. Animal welfare

The university will offer the RCR curriculum on-line, utilizing content developed by the Collaborative Institutional Training Initiative (CITI). The training takes between 2-4 hours to complete, and will be available after January 31.

Students Supported by National Science Foundation Grants

Effective January 4, 2010, all students (undergraduate, graduate and postdoctoral fellows) and postdoctoral associates who receive financial support from NSF grants are required to complete RCR training.

Students employed during the spring semester of 2010 are required to complete training prior to May 15, 2010 as a condition for future employment. Thereafter, all newly employed NSF students and post-docs are required to complete training prior to start of employment.

Sub-awardees

NSF also requires that sub-awardees fulfill training requirements in RCR. For those sub-awardees that have not developed their own curriculum, USC will permit access to CITI, so that their students may fulfill the RCR requirement.

Substitution of Alternative Training

Schools may provide supplemental RCR training and may develop their own courses in RCR. To satisfy the university requirement for NSF funded students, school developed training must be reviewed and approved by the Office of Research Advancement. Such curricula must cover the same nine topics as the university curriculum.
Students Supported by NIH Funding

Students supported by certain NIH grants (e.g., training grants) are also required to receive training in RCR. NIH mandates that RCR training be in the classroom. Therefore, on-line training does not fulfill NIH requirements for RCR training. Individual schools have developed appropriate curricula to fulfill these requirements.

Enforcement

The Office of Compliance will maintain a list of students and postdoctoral associates who have satisfied the RCR requirement in order to ensure that those subject to the training requirement have completed the training in a timely manner.

Evaluation and Expansion

By fall of 2010, students and faculty will be surveyed to assess the effectiveness of the CITI training program. Based on this assessment, the curriculum may be modified to better meet the needs for RCR training. If the curriculum proves to be effective, the University will expand the RCR training requirement to all PhD students.