LOYOLA UNIVERSITY NEW ORLEANS  
OFFICE OF GRANTS AND SPONSORED PROGRAMS  

RESPONSIBLE CONDUCT OF RESEARCH TRAINING POLICY FOR NSF AWARDS

I. Policy

A. Background

The America Competes Act, Section 7009 requires each institution that applies for NSF funding for scientific research to have a plan for providing “appropriate training and oversight in the responsible and ethical conduct of research to undergraduate students, graduate students, and postdoctoral researchers participating in the proposed research or education project.” Since January 4, 2010, the NSF has required each institution applying for research or education funding to certify that an adequate training plan has been established for all student and postdoctoral researchers to be supported by this funding. Post award the University is required to verify that each applicable student or postdoctoral researcher receives this training.

B. Policy Statement

Each Principal Investigator (PI)1 applying for an NSF research or education grant must develop a plan for providing appropriate training in the Responsible Conduct of Research (RCR) to all undergraduate, graduate, and postdoctoral researchers to be supported by the award. (For brevity, these student and postdoctoral researchers will be referred to as applicable researchers.) The plan should be developed at the time of grant application, but does not need to be discussed in the application. The training is to be conducted by the PI and verified by the Office of Grants and Sponsored Programs (“grants office”) before any applicable researcher is supported by NSF funding.

The PI is responsible for determining the content of the training, frequency of training, and delivery method appropriate for each applicable individual. The training plan may include online course modules, but must incorporate some face-to-face instruction. Unless otherwise justified by the PI, the content is expected to include those topics offered in the Collaborative Institutional Training Initiative (CITI) basic course in the Responsible Conduct of Research (see “Basic RCR Topics,” Procedures). PIs are encouraged, although not required, to take this course.

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1 Principle Investigator (PI) means the project leader or person at the University who is primarily in charge of the design of, conduct of, reporting of, and procurement of goods or services for the research or education program supported or to be supported by the NSF. For the purposes of this policy, this term applies even when this person is not listed as a Principal Investigator on the grant application, such as may occur for a project that is subcontracted to the University from another institution.
C. Scope

The policy applies to PIs and to undergraduate students, graduate students, and postdoctoral associates participating in research supported in whole or in part by an NSF research or education award. The policy applies whether the award is made directly to the University or through a subcontract. The current version of this policy applies to all awards applied for or received after January 1, 2015.

D. Responsibilities

Principal Investigator

- Develop an RCR training plan for each applicable student or postdoctoral researcher. Generally, this plan should be developed at or prior to the time of application.
- Provide the grants office with a list of all students and postdoctoral researchers to be supported by the award in a timely manner. Generally, this list should be provided at the time of award notification.
- Provide the grants office of copies of the training plan if requested.
- Administer the appropriate RCR training to each applicable researcher prior to his or her receiving wages, salary, or a stipend from the award.
- Provide evidence of training to the Office of Grants and Sponsored Programs as requested. Examples of acceptable evidence are listed in the Procedures section.

Office of Grants and Sponsored Programs

- Make this policy available to PIs, either through the grants office website or otherwise.
- Secure timely confirmation that each applicable individual identified by the PI receives appropriate training, in part by requesting that Financial Affairs inform the grants office of any PNF that would provide NSF-funded wages, salary, or stipends to a student or postdoctoral researcher.
- Budget permitting, provide PIs and applicable individuals with paid access to an online RCR training course as requested.
- Provide standard compliance tests to applicable researchers upon the PIs request.
- Maintain evidence of training for as long as is required by the award terms.

III. Procedures

Current Procedures can be found here and on the grants office website.

IV. Non-Compliance

If a PI fails to provide the Office of Grants and Sponsored Programs with a current and timely list of applicable researchers or otherwise fails to meet the requirements of this policy, the Office of Grants and Sponsored Programs will notify Financial Affairs that it
does not authorize continued spending from the award account. In addition, the grants office may report non-compliance to the appropriate dean and/or the Provost.

V. References


IV. Contact Information

For additional information, contact Heidi Davis, Director, Grants and Sponsored Programs, heidi@loyno.edu, (504) 865-3086.

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