

NCURA Neighborhoods Online Chat  
**RCR Compliance: How PUI's are Succeeding in Implementing Training Programs**  
January 20, 2010

Featured Guests: **Franci Farnsworth**, Coordinator of Sponsored Research, Middlebury College and **Frances Jeffries**, Special Assistant to the Provost, Wheaton College

**Moderator**

Welcome to today's online chat RCR Compliance: How PUI's are Succeeding in Implementing Training Programs sponsored by the PUI neighborhood committee. Joining us today to help sort out and shed some light on implementing RCR training are Fran Jeffries of Wheaton College and Franci Farnsworth of Middlebury College. First some background on our guest panelists:

**Franci (Frances) Vinal Farnsworth** is the Coordinator of Sponsored Research Middlebury College, Middlebury, VT.

Experience/Credentials: 23 years experience in research administration, 21 at Middlebury. She is the Founder of the CLASP email list (for Colleges of Liberal Arts Sponsored Programs) and current list administrator. Active in Council on Undergraduate Research (12 years as councilor in At Large Division, 2003 recipient of Volunteer of the Year). Have done presentations and workshops at CUR Conferences & Dialogues, CLASP meetings, Vermont statewide grants meetings, and individual small colleges.

Email: [farnswor@middlebury.edu](mailto:farnswor@middlebury.edu) Web: <http://www.middlebury.edu/administration/grants/>.

**Frances Jeffries** is the Special Assistant to the Provost Wheaton College (MA)

Experience/Credentials: Frequent workshop presenter since 1991, most recently: SRA 2008, 2009; NCURA 2007, 2008, 2009; AASCU Grants Resource Center, 2010. 18 years experience in research administration in predominantly undergraduate institutions. SRA International Distinguished Faculty; NCURA Region I Distinguished Service Award.

Email: [jeffries\\_frances@wheatoncollege.edu](mailto:jeffries_frances@wheatoncollege.edu)

Web: <http://wheatoncollege.edu/Provost/ResearchandScholarship.html>.

**Moderator**

Welcome ladies! Let's talk about RCR requirements...What are the actual requirements?

**Fran Jeffries**

So far, only NSF and NIH have implemented RCR requirements for grantees. We believe that other agencies will follow suit, just as happened with other areas of compliance.

**John Falconer**

Franci--- Looks like Middlebury is relying mostly in CITI for their RCR training... is this right?

**Franci Farnsworth**

John - The MIDDLEBURY COLLEGE PLAN for TRAINING UNDERGRADUATES IN THE RESPONSIBLE CONDUCT OF RESEARCH was approved in December. At present, the mandate and documentation requirements are only for students participating in NSF-funded research (receiving wages, working for credit, working as volunteer).

**Franci Farnsworth**

Middlebury's plan is based on students doing an appropriate CITI (or comparable) module AND the faculty member and student signing off on training related to the NIH 9.

**Moderator**

Other requirements Fran?

**Fran Jeffries**

NSF requires "... the institution has a plan to provide appropriate training and oversight in the responsible and ethical conduct of research to undergraduates, graduate students, and postdoctoral researchers who will be supported by NSF to conduct research."

**Fran Jeffries**

NIH requires RCR only on grants with a training component and as announced in the funding opportunity announcements.

**John Falconer**

Do any of your departments have RCR built into courses such as "research methods," and if this is factored into the campus plan? More directly, I'm wondering if there are territorial issues.

**Franci Farnsworth**

Yes, some of Middlebury's departments do have RCR built into courses and this isn't explicitly factored into the overall plan. But our dean for undergraduate research has wide flexible to waive requirements.

**Linda Cresap**

I was under the impression from the NIH guidelines that CITI was not enough. Don't the requirements ask for face-to-face instruction to be included?

**Fran Jeffries**

Linda: The training module is only part of the plan, which should be an on-going process including mentoring.

**Franci Farnsworth**

Linda - At present, NIH requires RCR only on grants with a training component and as announced in the funding opportunity announcements. And you're righty - they so say that an online module isn't enough.

**Jillain Veil-Ehnert**

Franci, you mention your plan was approved in December. Was this approved by faculty senate or others?

**Franci Farnsworth**

Jillian, we determined that our Provost had the authority to approve our plan - which relates only to NSF grants providing funding for undergraduates (we don't have other levels of students).

**Penny Miceli**

My question/comment is in regards to the how much of a change the NSF policy really requires, given what appears to be a longer-standing NIH policy for RCR training going back to 2000. Shouldn't institutions (at least those receiving NIH funding) already have a mechanism in place to provide RCR training. December 1, 2000PHS policy made it clear that

it is no longer just required for training grants. "It is the policy of PHS that research staff ...at extramural institutions shall complete a basic program of instruction in RCR...."

**Fran Jeffries**

Penny: Many PUI's developed plans on a case-by-case basis but now are incorporating the RCR more fully throughout the institution.

**Moderator**

Penny--does that answer your comment?

**Penny Miceli**

Sort of...but I do not think it is correct to say the NIH only requires RCR training for those on training grants. The December 1, 2000 policy document "extends the existing NIH educational requirement for research trainees to all research staff at extramural institutions who have direct and substantive involvement in proposing, performing, reviewing, or reporting research, or who receive research training, supported by PHS funds...or who otherwise work on PHS-supported research projects even if the individual does not receive PHS support." To me, it seems like NIH's policy (since 2000) is more stringent than the new NSF policy.

**Moderator**

Any insights on this issue that Penny's noted from others?

**Franci Farnsworth**

Penny, I think you're referring to the NIH RCR requirement that was never implemented. Many of us spent quite some time getting ready for it, but it was put on hold. To my knowledge, there is not NIH mandate that staff or others involved in NIH research grants be trained in RCR.

**Ann Bloor**

What department is responsible at your university for developing the training plan? Who oversees implementation and adherence to the training plan?

**Franci Farnsworth**

Ann, Middlebury is a small liberal arts college, so most research by students is mentored by faculty members who enjoy teaching students how to do research. In the sciences, most students are working on a subset of the faculty member's research. Our draft plan was developed by the Sponsored Research Office with input from the dean for undergraduate research and informed by discussions at conferences and on listservs; we invited NSF-funded faculty and department chairs to an open meeting to review the final draft and suggest final revisions.

**Moderator**

What is it that an agency will want to see (specifically) to determine if we are in compliance?

**Franci Farnsworth**

NSF and NIH require institutions to have a plan for RCR, as well as a system for demonstrating compliance. No one approach is mandated although NIH does provide some specifics. Each institution is to develop its own plan. We can talk more about examples.

**Moderator**

If you have comments/questions for our guests or to share please type them here and hit enter

**Moderator**

Are on-line training programs effective? Has this been measured or assessed somehow?

**Fran Jeffries**

The effectiveness will be determined by each vendor and each institution, according to its own criteria. Usually, the term "training programs" is used to mean modules or workshops, but in fact, it should mean an overall program including mentoring and other experiential learning. A3c) For the NIH requirement, on-line modules may be a component but there must also be substantive face-to-face training.

**Moderator**

If RCR is part of a research methods course (documented in a syllabus) is that sufficient?

**Fran Jeffries**

The adequacy of such a course will be determined, for now, by each institution and will be reflected in its RCR plan. Would any of you like to share some of the criteria and expected outcomes that you have defined?

**Moderator**

How multi-disciplinary can a program be? Can a training program effectively address humanists and scientists together?

**Franci Farnsworth**

The plan for RCR training should be able to effectively address humanists and scientists, but the specific on-line modules or other activities would have to be tailored to the specific disciplines. If your goal is broader than just complying with a specific agency's directive, it would be appropriate for the program to cover basic RCR principles and to address briefly the RCR issues in all disciplines.

**Moderator**

What is the timeline for training? Does it have to happen before research begins, or just be part of the experience?

**Fran Jeffries**

Neither the NIH nor NSF requirement includes a timeline. It seems reasonable that training should begin as early as possible in the research experience.

**Franci Farnsworth**

At Middlebury, our RCR plan requires that the training that is being certified take place during the summer or semester in which the undergraduate begins participating in the research.

**Moderator**

What about others?

**Anne Pascucci**

How did you prepare your faculty for the training?

**Fran Jeffries**

Faculty were involved in the discussion leading to the development and adoption of the RCR plan. Campus-wide workshops and specific training with the IRB and IACUC as well as with academic departments were also parts of the preparation.

**Franci Farnsworth**

At Middlebury, this past year our focus has been on complying with the new NSF requirement rather than a more broadly focused discussion of "responsible conduct of research." We already have an IRB and IACUC, each of which has its own training requirements. Many majors have "research methods" courses which cover issues related to conducting ethical research in the specific disciplines.

**Anne Pascucci**

A question about liability. Has the institution assumed liability for training all if it mandates it for all?

**Fran Jeffries**

Do you mean liability for training or for whatever may go wrong?

**Anne Pascucci**

For what ever may go wrong

**Franci Farnsworth**

Anne, This issue never came up at Middlebury. Our plan at present is clearly designed to meet an NSF requirement and we interpreted that in an educational context, rather than "certification" that undergraduates will never make mistakes. The liability issue is probably more critical for institutions funding research by graduate students and postdocs.

**John Falconer**

Like many institutions, we require that all human subject research--funded or not--go thru IRB. I suspect we would do the same with RCR training.

**Penny Miceli**

Ahh...Just looked up PHS policy online, and do see "suspended" next to it. Thanks for the clarification. Given where PHS thought about going, and where NSF is now going...are there institutions out there that are planning to extend the their RCR policy more widely than NSF supported students/postdocs? We are considering requiring it for any externally supported faculty or student (we don't have postdocs).

**Franci Farnsworth**

Penny, we are "considering" extending our plan to NIH funding (which we think will get there soon with a mandate anyway) and then to all externally funded students. And there was some discussion about providing the training through first year seminars or in some other broader way.

**Janet Rentsch**

I just entered the chat, so I apologize if you have addressed this already... similar to Anne's question about liability, do you document any on-line training with a certificate? and how do you document the discipline specific training?

**Franci Farnsworth**

Janet, at Middlebury we will document the training with both a certificate of online training (or dean's waiver) and a form signed by both the PI and student indicating that training has been provided by the PI in all relevant NIH 9 educational areas.

**Penny Miceli**

Franci, my Provost's attitude has been "let's get in front of this"...if the mandates are coming, NSF is probably just the beginning. Obviously this is more work for us (in terms of documentation), but also likely to annoy some faculty who aren't used to mandates.

**Kelly DeFatti**

In response to Penny's question... Lewis & Clark is hoping to require this for all, eventually. We are talking about a phase-in plan. That is, we'll start with those applying to NSF, then those with active or pending NSF or NIH grants, then those with other federal support, then others doing research, etc. The exact plan hasn't been outlined yet, but we definitely intend to start small and grow the RCR training.

**Fran Jeffries**

We have viewed this as a benefit to the institution not just as compliance. So many faculty have changed their syllabi.

**Franci Farnsworth**

Remember that the NSF policy applies to grants submitted effective Jan 4, 2010 - so as yet we don't have any grants subject to the NSF policy and no proposals have yet been submitted that include student participation. So we don't anticipate having to deal with documentation until next summer at the earliest. And our plan requires annual review and revision prior to July 1, beginning this year - so it all could change!

**Sofia Kakoulidis**

Are most of you using the CITI program to meet the NSF RCR requirement at this point?

**Janet Rentsch**

We are using the Citi research training modules for all undergraduate researchers, whether they are grant funded or not. All Citi certificates are sent to my office - we keep a copy and data base the training by person by date.

**Katie Plum**

For those who use the CITI training program for RCR - how helpful/effective have your institutions found it to be?

**Fran Jeffries**

Sofia: CITI is very popular but not the only option. We'll share a link to some additional resources in a minute. Watch for the URL.

**Anne Pascucci**

Sofia- Yes but with additional information and policy explanation. All certificates are to be forwarded to the IRB/IACUC Administrator.

**Fran Jeffries**

Here is the URL for training and other resources:

<http://wheatoncollege.edu/Provost/ResearchandScholarship.html> Under Policies and Procedures/Maintenance of Integrity in Research

**Leanne Prete**

University of NC Wilmington is using CITI plus face-to-face training by PI.

**Penny Miceli**

Keene State College just purchased CITI to meet RCR requirement, and also to implement IRB and IACUC modules...we are small and haven't had a lot in the way of training, and so this has presented us with an opportunity to think more generally about how we want to approach research integrity issues as we grow. I've been happy with CITI which I used at my previous institution.

**Franci Farnsworth**

Sofia, we rely on a CITI module (or something comparable approved by dean waiver) AND certification by PI and student that appropriate research specific training has been provided.

**Moderator**

Fran/Franci: How did you announce the new training requirements?

**Fran Jeffries**

When RCR was first discussed in the research community, we began to mention this to administrators and researchers at my home institution. When the actual requirements were announced, we talked with various individuals involved about how to meet those -- and to do it so that no grant opportunity was jeopardized.

**Franci Farnsworth**

It was much the same at Middlebury -- I spent over a year "nagging" the administration about the fact that we had to have an RCR plan in order to keep applying for NSF grants. The requirement for now relates only to NSF grants, funded from proposals submitted in 2010 or later. So we will announce it grant by grant.

**Franci Farnsworth**

I did a memo to the deans about the NSF requirement last spring. I'll post some of that language.

**Moderator**

Is it now your institution's policy?

**Fran Jeffries**

It is now the policy, but not necessarily the consistent practice. It is still a "work-in-progress" to achieve full integration into the research projects and to have RCR in the best form for our institution. It meets the requirement for now.

**Franci Farnsworth**

My memo provided background info and the exact NSF requirement and then "next steps":

**Franci Farnsworth**

Questions and Issues: 1. Does the institution plan to comply with this NSF requirement (or forego the opportunity to apply for NSF funding)? This is a decision that must be made by the AOR or by a senior academic official. 2. Who will be responsible for developing the plan,

implementing the plan, and maintaining the records (verification)? This is also a decision that must be made by the AOR or by a senior academic official. Appropriate positions and offices include: academic administrator responsible for faculty development and research, undergraduate research office (for institutions with few or no graduate students or postdocs), graduate student office, sponsored research office, compliance office (if one office oversees IACUC, IRB and other compliances), AOR's office. 3. There are two key questions about the scope of the RCR plan. The answers could come from the senior official as part of the "charge" for #2 above, or these answers could come during development of the plan. (1)

**Franci Farnsworth**

If you want to see the rest of the memo, send me an email: farnswor@middlebury.edu

**Franci Farnsworth**

re whether it's institutional policy: The MIDDLEBURY COLLEGE PLAN for TRAINING UNDERGRADUATES IN THE RESPONSIBLE CONDUCT OF RESEARCH was approved by our Provost in December. At present, the mandate and documentation requirements are only for students participating in NSF-funded research (receiving wages, working for credit, working as volunteer).

**Penny Miceli**

In describing the need for a policy regarding RCR training to my business office (financial folks), they suggested that they would like, for audit purposes, to capture info on who completed the training and when in the Banner Finance/HR System (we're a Banner school). The logic being that auditors will want proof in relation to a particular grant (e.g., Joe X was paid salary from grant fund X, and here is his proof of training in the system). CITI already keeps track of that, so I'm not sure we need to go to this extreme. Anyone else documenting in their Banner financial or HR system?

**Katie Plum**

Penny - no, but I would like to know how someone might document that in Banner, as we also use it.

**Leanne Prete**

UNCW is a Banner school but no one has suggested this.

**Franci Farnsworth**

Our Controller (the AOR) and grants accountant had the same question. I told them this seemed not that different from the requirement that grants comply with IRB and IACUC approval requirements - those certifications are maintained by the appropriate committees and thus I convinced them that having the Undergrad Research Office maintain the documentation was acceptable.

**Franci Farnsworth**

Middlebury is a Banner school, but no one suggested using it for this purpose - we haven't even been able to use it to track undergrad research experiences, which is something we would like to do.

**Penny Miceli**

Katie, I'm told by my HR Director that there are "open" fields that can be used for various purposes. HR recently required everyone to take an online sexual harassment course, and

documented in Banner. They tell me we can do the same thing with regard to RCR training for anyone receiving grant support.

**Fran Jeffries**

Have the Banner folks (vendor) mentioned this?

**Anne Pascucci**

If you are lucky enough to have a compliance officer, then I think that's where you would want to keep all of the RCR certs.

**Leanne Prete**

Yes - as compliance officer here at UNCW I plan to maintain that info. (Hi, Anne!)

**Moderator**

SO--What is the ultimate goal? Why are we bothering with this?

**Fran Jeffries**

Compliance has not been sufficient in preparing researchers to address the challenging questions that inevitably arise.

**Franci Farnsworth**

Even though we may come at this from a compliance perspective, we can't forget the fact that it's important that all research be conducted in an ethical manner and that students of all levels should learn how to do ethical research and what the issues are. Although we come at this initially from a compliance perspective, we cannot avoid considering the ethical questions and how those are addressed at our institutions.

**Penny Miceli**

Why bother...great question. For us, I think it speaks to our institutional mission to educate our undergrads. They should leave college knowing something about research ethics...because they might one day be a participant in a study, or doing studies themselves. They can be better consumers of research with this training.

**Moderator**

Has anyone found a vendor or consultant that they feel is better than most in the development or provision of the training?

**Franci Farnsworth**

Virtually all of the vendors attend research administrators' conferences. Each one has advantages and disadvantages. Each institution will choose according to its own criteria, volume and budget. PUIs with small volume, for example, may not need the record-keeping option.

**Fran Jeffries**

Some of the organizations and listservs that are useful include: CUR (especially Undergraduate Research Program Directors), IRB discussion, RESADM, NCURA Compliance and PUI Neighborhoods, PRIM&R, CLASP Details are list at URL that we already posted.

**John Falconer**

Holistic student development (Putting Students First, by Larry Braskamp)

**Anne Pascucci**

What are the NIH 9?

**Franci Farnsworth**

These are the RCR instructional areas identified by NIH back in the early 2000s when NIH planned to implement an RCR requirement for all grants: Data Management, Conflict of Interest/Conflict of Commitment, Human Subjects, Animal Welfare, Misconduct, Responsible Authorship, Mentor/Trainee Relationships, Peer Review, Collaborative Science

**Moderator**

Great discussion. It appears like most issues for PUIs you can learn a lot from each other. I encourage you to share your issues with your PUI colleagues via the neighborhood listserv

**Moderator**

Any closing comments ladies?

**John Falconer**

Thanks very much, Fran, Franci, and "moderator"!

**Lynda Parlett**

This discussion has been a great help. Thanks!

**Charles Eaton**

Yes, this has been most helpful, thank you!

**Franci Farnsworth**

Feel free to contact me by email if you have any additional questions (remembering that Middlebury is not only PUI, but liberal arts and only 2400 students overall).

**Leanne Prete**

Thank you very much!

**Moderator**

We will post a full transcript of the chat in the neighborhoods within a week. Good Afternoon.