

## **Montana State University Plan to Comply with America COMPETES Act**

### **NSF RCR Requirements**

The 2007 America COMPETES Act directed NSF to **require** that all NSF funded students and postdocs undergo training in the responsible conduct of research (RCR). Implementation of this requirement **becomes effective January 4, 2010**, when all institutions submitting proposals to the National Science Foundation (NSF) must certify that they have a training plan in place for undergraduate and graduate students and postdoctoral scholars who will be supported by NSF to conduct research and other scholarly activities. This certification must be in place at the time of proposal submission. Training plans do not need to be submitted with the proposal, but are subject to review upon request. Institutions are responsible for verifying that undergraduates, graduate students, and postdoctoral scholars receive training.

These guidelines are enumerated in detail in the January 2010 NSF Proposal and Award Policies and Procedures Guide, specifically in Part I - Grant Proposal Guide, Chapter II. C.1e and in Part II - Award and Administration Guide, Chapter IV.B found at the NSF website:

[http://www.nsf.gov/pubs/policydocs/pappguide/nsf10\\_1/aag\\_4.jsp](http://www.nsf.gov/pubs/policydocs/pappguide/nsf10_1/aag_4.jsp). FAQs are available at:

[http://www.nsf.gov/pubs/policydocs/rcr/faqs\\_mar10.pdf](http://www.nsf.gov/pubs/policydocs/rcr/faqs_mar10.pdf)

Montana State University will require Principal Investigators (PIs) that receive NSF awards containing the RCR language to identify students and postdocs receiving payments under this award and that they will also be responsible for determining the appropriate amount of RCR training needed for each student/postdoc. It is suggested that at a minimum each person involved should take one on-line training module offered via the Collaborative Institutional Training Initiative (CITI) that MSU has recently joined. The CITI program is a subscription service that provides research ethics education to members of the research community. The exact course selection and number of courses will be determined by the PI as is the timeframe for the training, but it is suggested that the training take place shortly after being funded by an NSF award and prior to the end date of the award. The CITI website is:

<https://www.citiprogram.org/>. A personalized training program can be established for each participant utilizing the CITI module selection.

Upon completion of each module a confirmation is generated by the CITI program and a copy must be retained by both the PI and the department. This documentation is necessary in order to confirm compliance with the RCR training requirement. The Office of Sponsored Programs will receive an electronic confirmation of persons completing CITI modules and those lists will be compared to a report of NSF funded personnel to identify personnel that might be overlooked in this process.

The NSF has provided funding for two institutions to develop RCR training materials and PIs are encouraged to visit these sites and utilize the tools located there in addition to the CITI resource.

- <http://www.onlineethics.org/CMS/about/UserGuide/18848.aspx>
- <http://www.umass.edu/sts/digitallibrary/>

**A discussion of how PIs provided RCR training to their students and postdocs will be required in the new Public Outcomes Report required by the NSF and submitted on Research.gov.**