



Western Michigan University

Office of the Vice President for Research

**WMU Policy and Procedures for Completing the
National Science Foundation's (NSF) Implementation of §7009 of the America COMPETES Act:
Training and Oversight in the Responsible and Ethical Conduct of Research**

**In collaboration with the OVPR, this policy was developed by the
Research Ethics Advisory Team:**

Paula D. Kohler, Associate Vice President for Research, Team Chair
Sandra Borden, Professor, Communication
Kevin Corder, Chair, Political Science
David Cowan, Chair, Biological Sciences
Marianne DiPierro, Director, Graduate Center for Research and Retention
Wayne Fuqua, Chair, Psychology
David Hartmann, Chair, Sociology
Vicki Janson, Research Compliance Officer
Michael Pritchard, Professor, Philosophy
Tom VanValey, Professor, Sociology

Final policy adopted by the Vice President for Research, November 1, 2010

Presented to the Research Policies Council, December 2, 2010

Presented to Provost and Deans, December 7, 2010

Approved by the Office of the Vice President for Legal Affairs and General Counsel, January 12, 2011

Policy effective January 1, 2011 for all NSF proposals submitted on or after January 4, 2010



**WMU Policy and Procedures for Completing the
National Science Foundation's (NSF) Implementation of §7009 of the America COMPETES Act:
Training and Oversight in the Responsible and Ethical Conduct of Research**

Overview of the NSF Requirement

- ▶ An institution must have a plan in place 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.
- ▶ Institutional certification to this effect is required for each proposal.
- ▶ Training plans are **NOT** required to be included in proposals submitted to NSF, but institutions are subject to review, upon request.
- ▶ An institution must designate one or more persons to oversee compliance with the RCR training requirement.
- ▶ Institutions are responsible for verifying that undergraduate students, graduate students, and postdoctoral researchers supported by NSF to conduct research have received training in the responsible and ethical conduct of research.

WMU Policy

Effective Date

This policy is effective January 1, 2011 for all NSF proposals submitted on or after February 4, 2010.

Training Materials

WMU has selected the Collaborative Institutional Training Initiative – CITI program – Responsible Conduct of Research as the basic requirement in our ethics training program. Modules are available at: <https://www.citiprogram.org/>. Based on the discipline most closely aligned with the NSF-funded project, participants must complete **one** of the following courses, **to be determined by the PI**:

- ▶ Biomedical Responsible Conduct of Research Course
- ▶ Social and Behavioral Responsible Conduct of Research Course
- ▶ Physical Science Responsible Conduct of Research Course
- ▶ Humanities Responsible Conduct of Research Course
- ▶ Responsible Conduct of Research for Engineers
- ▶ Responsible Conduct of Research for Administrators

Personnel involved in research with human subjects must also complete the designated human subjects modules in the CITI Program.

Time Period

As indicated in Table 1, participants must complete the training requirement within **30 calendar days** of their paid appointment or unpaid assignment to the project. Participants must be recertified every **five** years. Evidence of their successful completion of the required CITI Program course will be generated by the system and provided to the WMU Research Compliance Officer.

Noncompliance with WMU’s Policy to Meet NSF Research Ethics Training Requirements

Failure by WMU principal investigators (PIs) and/co-investigators (Co-PIs) to adhere with this policy and/or follow WMU procedures outlined herein will result in the following: (a) the NSF-funded project activities will be suspended, and as possible (b) fiscal activity associated with the NSF-funded project will be suspended. Continued failure to comply with the policy or non-compliance by students, postdoctoral staff, or other project supported staff may result in termination of employment; failure to comply with the training requirements outlined for sub-contract personnel may result in cancellation of the subcontract.

Participants

Table 1 illustrates the NSF project-related participants required to complete the WMU research ethics training requirements.

Table 1
Training Requirements of NSF-Funded Project Personnel

Participants	Training Requirement	Time Frame in Calendar Days
<i>WMU Faculty and Staff</i>		
▸ Faculty investigators (PIs, co-PIs)	Mandatory	30 days from notice of requirement
▸ Staff directly involved in the funded project	Mandatory	30 days from appointment
▸ Staff indirectly involved in the funded project	PI’s discretion	PI’s discretion
▸ Postdoctoral researchers involved in the funded project	Mandatory	30 days from appointment
<i>WMU Students</i>		
▸ Graduate, undergraduate students paid from project funds	Mandatory	30 days from appointment to project
▸ Graduate, undergraduate students involved in the funded project but <i>not</i> paid from project funds	Mandatory	30 days from assignment to project
<i>Subcontractors</i>		
▸ Students or postdoctoral researchers involved in the subcontract work funded by a WMU NSF project	Mandatory	
▪ If subcontracting organization has NSF training plan	▪ Organization’s plan	Per organization’s plan
▪ If subcontracting organization does not have NSF training plan	▪ WMU plan	30 days from contract effective date

Oversight Responsibility

The WMU Research Compliance Officer will have oversight responsibility for implementation of the WMU policy and procedures. The compliance officer will maintain a current copy of WMU's policy and procedures in both the compliance office and on the OVPR website.

WMU Procedures

PI Notification

For a NSF-funded project, written notification will be sent by the Grants and Contracts Office to inform the PI of the research ethics training requirements. The notification will also inform the PI that the Research Compliance Officer will contact him/her to provide the necessary details and procedures; a copy of the notification will be provided to the Research Compliance Officer, the chair, and the office coordinator (or other relevant unit contact).

Within **five** business days of his/her receipt of the PI notification from the Grants and Contracts Office, the Research Compliance Officer will send detailed instructions to the PI with the following information:

- ▶ Overview of NSF requirement and reference (web address) for relevant WMU policy
- ▶ Personnel required to participate in the ethics training
- ▶ Training requirements
- ▶ Time frame for training completion and re-certification
- ▶ PI's responsibility to notify compliance officer of project personnel
- ▶ PI's responsibility to include notice of the research ethics training requirements in student, postdoctoral, and staff appointment letters and project orientations provided to paid and non-paid staff working on the NSF project. The employment appointment letter will also include a statement that a participant's employment status will be suspended after 30 calendar days from appointment if the training requirement is not met. If the training requirement remains unmet after 30 calendar days from suspension date, the project employee is subject to disciplinary action, including but not limited to termination of employment.

Responsibility of the Principal Investigator

Within **10** business days of notification regarding research ethics training for personnel associated with the project (paid or unpaid), or **10** business days from the date of appointment or assignment of new personnel, the PI will notify the Research Compliance Officer of the names of project personnel corresponding to those participants indicated in Table 1 above (see Attachment A for the reporting form).

The Research Compliance Office will maintain records of personnel participating on NSF projects and the training certification provided by the CITI Program.

Within 30 calendar days of notification from the Research Compliance Officer regarding research ethics training, the PI and Co-PIs will complete their training requirements.

Procedures for Noncompliance

If after the required time period for meeting the training requirements, the compliance office determines that training requirements are not met by a project participant, the Research Compliance Officer will notify the PI and the Grants and Contracts Office. Action will be taken as follows for specific project participants.

WMU PIs/CoPIs

If WMU faculty or staff PI or Co-PI(s) fail to comply with the policy, the Grants and Contracts Office will suspend fiscal activity, as possible, on the project until the training requirements are met.

Paid Project Staff

In the case that paid project staff other than WMU faculty or staff PI or Co-PI(s), such as post-doctoral fellows, have not met the training requirements within 30 calendar days of their appointment, his/her employment status will be suspended; if training requirements remain unmet after 30 calendar days from the suspension date, the project employee will be subject to disciplinary action, including but not limited to termination of employment.

Project-Supported Students

In the case that a student supported by the project (i.e., a student receiving either salary, tuition, and/or fees from the NSF funds) has not met the training requirements within 30 calendar days of his or her appointment, the NSF project support will be suspended; if training requirements remain unmet after 30 calendar days from the suspension date, the NSF project support will be withdrawn and any tuition and/or fees already paid by the project will become owed by the student.

Unpaid Project Personnel

In the case that unpaid project personnel (e.g., unpaid students) have not met the training requirements within 30 calendar days of their assignment to the project, his/her involvement in the project must be suspended by the PI until training requirements are met.

Attachment A
Example of Project Personnel List for NSF-Funded Project – PI Provide to Research Compliance Officer

WMU Staff and Students

Project Personnel	Appointment Date	Name
<i>WMU Faculty and Staff</i>		
<ul style="list-style-type: none"> ▶ Faculty investigators (PIs, co-PIs) ▶ Staff <i>directly</i> involved in the funded project ▶ Staff <i>indirectly</i> involved in the funded project ▶ Postdoctoral researchers involved in the funded project 		
<i>WMU Students</i>		
<ul style="list-style-type: none"> ▶ Graduate, undergraduate students <i>paid</i> from project funds ▶ Graduate, undergraduate students involved in the funded project but <i>not</i> paid from project funds 		

Subcontractor Information

Subcontracting Organization(s)	Relevant NSF Training Plan (Indicate WMU or Organization's)	Organizational Contact