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## POLICY FOR PARTICIPATION IN RESPONSIBLE CONDUCT OF RESEARCH TRAINING

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### **POLICY STATEMENT**

Lipscomb University (“Lipscomb”) requires that all faculty, students, postdoctoral fellows, and investigators participating in any externally funded research or sponsored program successfully complete responsible conduct of research (“RCR”) training if the Federal Awarding Agency makes RCR training a term or condition of the award. In addition, Lipscomb’s Office of Research and Grants (“ORG”) or Lipscomb’s Institutional Review Board (“IRB”) may direct any other individuals participating in any externally funded research or sponsor program to complete RCR training. Lipscomb encourages and welcomes all members of the Lipscomb research community to participate in RCR training.

### **PURPOSE**

The purpose of this policy is to promote research ethics and integrity at Lipscomb through RCR training.

### **APPLICABILITY**

This policy is applicable to any Lipscomb employee or student participating in an externally funded research or sponsored program administered by the Office of Research and Grants.

### **DEFINITIONS**

Capitalized terms that are used but not otherwise defined in this policy have the following meanings:

*CFR* means the Code of Federal Regulations.

*Collaborative Institutional Training Initiative (CITI or CITI Program)* is the virtual training provider currently utilized by Lipscomb to provide training in research, research conduct, and compliance.

*Federal Agency or Agency*, as defined in 5 U.S.C. §551(1) and further clarified in 5 U.S.C. §552(f), generally means each authority of the Government of the United States, whether or not it is within or subject to review by another agency.

*Federal Award*, as defined in 2 CFR §200.1, has the following meaning, depending on the context:

(1)(i) The Federal financial assistance that Lipscomb receives directly from a Federal Awarding Agency or indirectly from a pass-through entity, as described in 2 CFR §200.101; or (ii) the cost-reimbursement contract under the Federal Acquisition Regulations that a non-Federal entity receives directly from a Federal Awarding Agency or indirectly from a pass-through entity, as described in 2 CFR §200.101.

(2) The instrument setting forth the terms and conditions. The instrument is the grant agreement, cooperative agreement, other agreement for assistance covered in paragraph (2) of the definition of Federal financial assistance in 2 CFR §200.1, or the cost-reimbursement contract awarded under the Federal Acquisition Regulations (48 CFR §52.204-17).

Federal Award does not include other contracts that a Federal Agency uses to buy goods or services from a contractor or a contract to operate Federal Government owned, contractor operated facilities. See also the definitions of Federal financial assistance, grant agreement, and cooperative agreement in 2 CFR §200.1.

*Federal Awarding Agency*, as defined in 2 CFR §200.1, means the Federal Agency that provides a Federal Award directly to a non-Federal entity.

*Institutional RCR Coordinator* means the individual appointed by Lipscomb to provide or coordinate compliant RCR and ethics training opportunities that support the research enterprise.

*Principal Investigator*, or *PI*, and *Project Director*, or *PD*, mean the individuals who bear the responsibility for the overall operation and performance of the externally funded research or sponsored program, including management, reporting, subrecipient monitoring, record retention, compliance, effort certification, and other activities supporting program delivery and management. PI is commonly used in research grants, whereas PD is commonly used for awards that are more programmatic in nature without a dedicated research component. As used in this policy, Principal Investigator includes the role of co-Principal Investigator. As used in this policy, Principal Investigator includes the role of co-Principal Investigator.

*Responsible Conduct of Research ("RCR")*, as used by the [National Institutes of Health](#) ("NIH"), promotes the aims of scientific inquiry, fosters a research environment that enables scientists to work together toward common goals, and promotes public confidence in scientific knowledge and progress for the public good.

## **PROCEDURES**

Lipscomb requires that all faculty, students, postdoctoral fellows, and investigators participating in any externally funded research or sponsored program successfully complete RCR training if the Federal Awarding Agency makes RCR training a term or condition of the award. In addition, the ORG or IRB may direct any other individuals participating in any externally funded research or sponsor program to complete RCR training. Lipscomb encourages and welcomes all members of the Lipscomb research community to participate in RCR training.

## **COMPLIANCE**

Federal Awarding Agencies have statutory requirements as to which individuals participating in externally funded research or sponsored programs need to complete RCR training. Lipscomb's compliance with this training requirement is tracked by the ORG and IRB. Federal Awarding Agencies requiring completion of virtual or face-to-face RCR training include, but are not limited to, the NIH, the National Science Foundation ("NSF"), and the U.S. Department of Agriculture's National Institute of Food and Agriculture ("NIFA"). Compliance is also required for direct federal flow-through awards as well as subawards received by partnering institutions and organizations.

## **NON-COMPLIANCE**

Non-compliance with RCR training requirements may result in any of a number of consequences, including, but not limited to, disallowance of salary and any associated expenses charged to the

externally funded research or sponsored project, removal of the PI from the project, the appointment of a replacement PI, removal from research support roles for a sponsored project, loss of eligibility to apply for future grants, termination of assistantships, or referral for academic disciplinary action.

#### VIRTUAL TRAINING

Lipscomb provides training courses through the CITI Program available at [www.citiprogram.org](http://www.citiprogram.org). On the CITI Program website, click on “My Courses” and “Log In” if you already have an account, or “Register” an account in the system if you do not have an account. Select “Lipscomb University” as the Organization Affiliation. Enroll in the course entitled “Responsible Conduct of Research (RCR).”

#### IN-PERSON OR FACE-TO-FACE TRAINING

Lipscomb also provides a minimum of eight hours of in-person RCR training, which is required by the NIH for selected awards. The in-person RCR training must be completed within the first year of the appointment to the project or before the applicable person graduates or otherwise leaves Lipscomb, even if that imposes a shorter deadline.

Upon completion of RCR training requirements, a certificate of completion will be issued by ORG to document that the requirements of the externally funded research or sponsored program have been met. It is the responsibility of the individual receiving the certification to provide appropriate copies to the IRB and/or the PI.

#### RESPONSIBILITIES

Lipscomb’s Institutional RCR Coordinator, who serves in the ORG, shall:

- Develop, deliver, and/or coordinate ORG-led, face-to-face, online/virtual, and hybrid trainings for the campus community in compliance with the applicable requirements of a Federal Awarding Agency (e.g., NIH, NSF, or NIFA);
- Take attendance and issue Certificates of Participation or Certificates of Completion to attendees;
- Retain appropriate documentation for all RCR training sessions in accordance with 2 CFR § 200.334, which may include slideshows, attendance, surveys, guest speakers, handouts, presentation dates/times/durations, and other relevant information; and
- Provide appropriate documentation to applicable Federal Awarding Agencies upon request, reporting, and/or audit purposes.

The ORG shall:

- Ensure that PIs of awards requiring RCR as a term or condition of the award are informed of the requirement and can communicate that requirement to appropriate senior personnel, faculty, staff, students, and others;
- Ensure that an annual RCR training calendar of in-person events is available to the campus community on Lipscomb’s website;
- Complete federal or sponsoring agency certifications, approved by the Authorized Organizational Representative, attesting that Lipscomb has or will provide an appropriate RCR training plan at the time of funding and will communicate all such requirements to the Institutional RCR Coordinator to ensure continuity of programming (if such an attestation is required at the time of submission or award acceptance);
- Provide RCR training plans to the Federal Awarding Agency (and auditors) upon request; and
- Retain all certificates for at least three years after completion, in compliance with 2 CFR § 200.334.

**CONFLICT**

This policy is subject to applicable law. In the event of any conflict between the provisions of this policy and applicable law, including, without limitation, Section 7009 of the America COMPETES Act, the provisions of applicable law shall control.

**CONTACT**

For additional information or questions regarding this policy, contact the Office of Research and Grants, which can be reached at 615-966-5907.

**EFFECTIVE DATE**

This policy was approved by the Office of the Provost on May 12, 2023.