

**The Georgia Tech Responsible Conduct of Research (RCR) Compliance Policy -  
Frequently Asked Questions**  
Last Updated April 20, 2018

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## APPLICABILITY

### 1) *Which funding sources does the RCR Compliance Policy apply to?*

Answer: The RCR Compliance Policy applies to certain categories of grants funded by the:

- National Science Foundation (NSF)
- National Institutes of Health (NIH)
- US Department of Agriculture (USDA) National Institute of Food and Agriculture (NIFA)

The Policy also applies to the Georgia Tech President's Undergraduate Research Award (PURA) program. The Policy may expand to cover other funding sources in the future.

### 2) *Which specific types of NSF awards require RCR training and who is required to do the training?*

Answer: Undergraduate students, graduate students, and postdoctoral researchers, whether as an employee, GRA, or other trainee, are required to complete RCR training if they are funded by new NSF proposals submitted, or due, on or after January 4, 2010, to conduct research. The Policy also applies to NSF GRFP Fellows funded by Fellowship Offers effective with the 2010 Competition.

### 3) *Which specific types of NIH awards require RCR training and who is required to do the training?*

Answer: Undergraduate students, graduate students, and postdoctoral researchers are required to complete RCR training if they are funded by any of the following NIH programs: D43, D71, F05, F30, F31, F32, F33, F34, F37, F38, K01, K02, K05, K07, K08, K12, K18, K22, K23, K24, K25, K26, K30, KL1, KL2, R25, R36, T15, T32, T34, T35, T36, T37, T90/R90, TL1, TU2, and U2R. For the K99/R00 program, only the PI (fellow) of the project is required to complete the RCR training.

### 4) *Which specific types of USDA NIFA awards require RCR training and who is required to do the training?*

Answer: All researchers funded by the USDA National Institute of Food and Agriculture (NIFA) program, **including the principal investigator, other faculty members, students, postdocs, and any staff participating in the research project (defined as funded by the project)**, are required to complete the training.

### 5) *How does a faculty or staff member determine whether a particular project requires RCR training?*

Answer: Covered projects will be flagged "RCR Training = Yes" in the Contract Information System under the "Terms & Conditions" tab and under the "My Pages" section of GTCrossroads in the portlet entitled "Effort on My Projects". New awards will receive an ICOL notice indicating that the project requires RCR training.

- 6) *If a trainee is working on a NIH or NSF funded project but is not being paid, is the trainee required by the RCR Compliance Policy to complete RCR training?***

Answer: No. Unless the PI or School stipulates otherwise, RCR training is recommended but not required for a trainee in this circumstance.

- 7) *If a Georgia Tech employee (for example, a research scientist) is enrolled as a student while supported by an applicable NIH or NSF funded project, is that individual required by the RCR Compliance Policy to complete RCR training?***

Answer: Yes.

## **TRAINING REQUIREMENTS BY FUNDING SOURCE**

- 8) *What does the RCR Compliance Policy require of applicable NSF-funded undergraduate students, graduate students, and postdocs?***

Answer: They must complete both: (1) an [online CITI RCR course](#) and (2) [in-person RCR training](#). The type and amount of in-person training varies depending on the trainee's career stage (refer to the [RCR Compliance Training Matrix](#)).

- 9) *What does the RCR Compliance Policy require of applicable NIH-funded undergraduate students, graduate students, and postdocs?***

Answer: They must complete both: (1) an [online CITI RCR course](#) and (2) at least 8 hours of [in-person RCR training](#).

- 10) *What does the RCR Compliance Policy require of USDA NIFA researchers?***

Answer: All researchers funded through the USDA NIFA program, including the principal investigator, other faculty members, students, postdocs, and any staff participating in the research project (defined as those who are funded by the project), must complete an [online CITI RCR course](#). The PIs of projects sponsored by USDA NIFA are strongly encouraged to provide discussion-based training opportunities for their research team as well.

- 11) *What does the RCR Compliance Policy require of PURA students?***

Answer: They must complete an [online CITI RCR course](#). In-person RCR training is recommended but not required for PURA students.

## **TRAINING COMPLETION DEADLINES**

- 12) *By when must the online CITI RCR course be completed?***

Answer: The online training must be successfully completed within ninety [90] days of first being appointed to a covered project. However, the online training requirement must be completed before an applicable person graduates or otherwise leaves the Institute even if that imposes a shorter deadline.

**13) *By when must in-person RCR compliance training be completed?***

Answer: The in-person RCR training requirement must be completed within the first year of the appointment to a covered project (except as noted in the next paragraph). However, the in-person training requirement must be completed before the applicable person graduates or otherwise leaves the Institute even if that imposes a shorter deadline. In cases where a student receives a degree but remains continuously enrolled at Georgia Tech, the one-year deadline can still apply.

A doctoral student funded by a covered project must follow the in-person completion deadline delineated in the RCR Compliance Policy unless the “in-house” RCR course required by their home academic unit is not offered during the first year of the student’s doctoral program. If an applicable doctoral student is unable to complete the required in-person RCR training prior to graduating or leaving the Institute, the student must, at a minimum, have an RCR exit interview with the PI/advisor.

**14) *Does the RCR training have to be completed even if an applicable person has already left the project?***

Answer: Yes, the training must be completed even if the applicable person has already left the project. Penalties for non-compliance will be applied if the training is not completed (see Q44 and Q45).

**ONLINE RCR TRAINING**

**15) *If I completed another CITI course, such as the CITI Human Subjects Research / IRB course, do I still need to take the CITI RCR course?***

Answer: Yes, a CITI RCR course must be completed even if other CITI courses have already been taken. For example, the CITI IRB course **does not** count towards the online RCR training requirement.

**16) *Does the online CITI RCR training need to be repeated while at Georgia Tech?***

Answer: No. The online CITI RCR training does not have an expiration date. It only needs to be completed once while at Georgia Tech.

**17) *If I completed a CITI RCR course before attending Georgia Tech, do I need to take it again?***

Answer: It depends. The credit for the CITI RCR modules that you completed at your prior institution should transfer over if they are the same modules that Georgia Tech uses. You must log in through the [GT CITI SSO link](#) with your Georgia Tech ID, add the CITI RCR course to your “Georgia Institute of Technology Courses”, and complete any additional required modules before the CITI RCR course credit can be transferred over to your Georgia Tech CITI account. It might be necessary to first [match your existing CITI account](#) with your Georgia Tech SSO account if the system is not automatically able to match your existing account to your GT credentials.

**18) Does the individual who took an online CITI RCR course need to notify OSP when the training is completed?**

Answer: In general, it is not necessary to notify OSP when the online course is completed. The training record will be documented in Georgia Tech's systems as long as you go through [the RCR website](#) or the SSO login on CITI's site. Records of the CITI RCR course completions are uploaded and maintained in Banner and in the Research Education training system. However, it is recommended that trainees notify their PI once the training has been done and that they keep a copy of the completion certificate, which [can be obtained from CITI](#).

**IN-PERSON RCR COMPLIANCE TRAINING**

**19) Which topics should be covered during in-person RCR compliance training?**

Answer: Trainees shall engage in a program of study in RCR that includes some or all of the following elements:

- Conflicts of interest (personal, professional, and financial)
- Policies regarding the use of human subjects in research
- Policies regarding the use of vertebrate animals in research
- Laboratory safety, biohazard management, chemical safety, and policies regarding the use of radioisotopes and radiation sources in research
- The responsibilities and relationships of mentors and mentees
- Collaborative research
- The peer review process
- Data acquisition and laboratory tools; management, sharing and ownership of data and research tools
- Research misconduct and policies for handling research misconduct
- Authorship and publication
- Science and engineering in society: the scientist and engineer as responsible members of society and ethical issues in research and the environmental and societal impacts of scientific research

**20) If I am satisfying the in-person requirement through RCR Workshops, which topics should I choose?**

Answer: Trainees needing only one contact hour are strongly encouraged to select the Research Misconduct topic. Those who need additional hours can choose from among the topics offered but should avoid repeating the same topic if possible.

**21) What options do applicable undergraduate students funded by NSF or NIH have for completing the in-person RCR compliance training requirement and how many hours of the training is required?**

Answer: The in-person RCR requirement training options for these undergraduates can be found by [clicking here](#). Applicable NSF funded undergraduates must complete at least one hour of in-person training; applicable NIH funded undergraduates must complete at least 8 hours of in-person training.

**22) What options do applicable master's students funded by NSF or NIH have for completing the in-person RCR compliance training requirement and how many hours of the training is required?**

Answer: The in-person RCR requirement training options for these master's students can be found by [clicking here](#). Applicable NSF funded master's students must complete at least 2 hours of in-person training; applicable NIH funded master's students must complete at least 8 hours of in-person training.

**23) What options do applicable doctoral students funded by NSF or NIH have for completing the in-person RCR compliance training requirement?**

Answer: Applicable doctoral students funded by NSF or NIH must adhere to the same in-person training requirement delineated in the [GT RCR Academic Policy for Doctoral Students](#), which involves completing [a course listed here](#). Doctoral students covered by the RCR Compliance Policy who began their graduate program prior to Fall 2011 should check with OSP if they need to discuss other options for satisfying the in-person training requirement (for example, if the student is no longer enrolled full time or is no longer on the Atlanta campus).

**24) What options do applicable postdoctoral researchers funded by NSF or NIH have for completing the in-person RCR compliance training requirement and how many hours of the training is required?**

Answer: The in-person RCR requirement training options for these postdocs can be found by [clicking here](#). Applicable NSF funded postdocs must complete at least 4 hours of in-person training; applicable NIH funded postdocs must complete at least 8 hours of in-person training.

**25) Do I need to receive in-person RCR training at Georgia Tech if I started my degree at another institution and completed RCR training there?**

Answer: Yes. You must complete Georgia Tech's in-person training requirement.

**26) If I completed PHIL 6000 or another approved doctoral RCR course prior to being assigned to a covered NSF or NIH project, does that satisfy the in-person RCR compliance training requirement for graduate students?**

Answer: Yes. Successfully completing PHIL 6000 or another approved [doctoral RCR course](#) can satisfy the in-person compliance training requirement, including if you were a master's student when taking the course. However, additional in-person RCR training may be required if you transition from graduate student to postdoctoral researcher and/or if your funding source requires re-training (see Q33 and Q34).

**27) If I enroll as a graduate student for PHIL 6000 but only need a certain number of in-person training hours (for example, 8 for NIH), do I need to attend the entire course?**

Answer: Yes. Students must register for PHIL 6000 and fulfill the course's normal requirements. It is a one credit, pass/fail graduate course.

**28) If I am a postdoctoral researcher, how do I get permission to attend PHIL 6000 and do I need to attend the entire course?**

Answer: You should contact [Dr. Jason Borenstein](#) to discuss the course.

## **COMPARISON WITH THE RCR ACADEMIC POLICIES**

**29) How do the RCR Compliance Policy's requirements for applicable NSF and NIH doctoral students differ from the ones described in the RCR Academic Policy for Doctoral Students?**

Answer: Both policies require the same forms of online and in-person RCR training for doctoral students. However, the Compliance Policy has a stricter completion deadline for the in-person training, which must be followed except as indicated in Q13. If a doctoral student is covered by the RCR Compliance Policy and began a graduate program prior to Fall 2011, the student can check with OSP if a different form of in-person training is needed (for example, if the student is no longer enrolled full time or is no longer on the Atlanta campus).

**30) How do the RCR Compliance Policy's requirements for applicable NSF and NIH master's students differ from the ones described in the RCR Academic Policy for Master's Thesis Students?**

Answer: The RCR Academic Policy for Master's Thesis Students only requires one form of RCR training ([either online or in-person](#)). In contrast, applicable master's students funded by NSF or NIH must complete **both** online and in-person RCR training. Master's students covered by both policies must adhere to the requirements of the RCR Compliance Policy, including stricter completion deadlines.

**31) I have completed the training required by the RCR Academic Policy for Master's Thesis Students but now am appointed to a covered NSF or NIH project, do I need additional RCR training?**

Answer: Depending on [which of the three options](#) was selected from the Master's Thesis Policy, you will need to complete any additional training required by the RCR Compliance Policy (an online CITI RCR course or in-person RCR training hours).

## **CHANGE OF CAREER STAGE AND RE-TRAINING REQUIREMENTS**

**32) If I change career stage while funded by the same covered NSF or NIH project and have not yet taken in-person training, which requirement do I follow?**

Answer: If you change career stage while still on the same covered NSF or NIH project, you must at a minimum fulfill the compliance requirements of your career stage when first appointed to the project. If you plan to transition from a master's to a doctoral program, you will likely be required by RCR Academic Policy for Doctoral Students to complete a [doctoral RCR course](#). If you plan to transition from a doctoral to a master's program while on a covered project and believe that you will be unable to complete the doctoral in-person RCR training requirement, check with OSP to discuss other in-person training options.

**33) Is there a re-training requirement if I change career stage and am added to a different covered NSF or NIH project while at Georgia Tech?**

Answer: Any applicable student who received RCR training during one career stage at Georgia Tech (for example, as an undergraduate) and is required to complete RCR training after changing to a different career stage at the Institute (for example, by becoming a master's student) must at a minimum complete any additional RCR training requirements associated with the latter career stage. A postdoctoral researcher in this circumstance who received RCR training as a doctoral student at Georgia Tech must complete at least 1 additional "in-person" training hour. Applicable students and postdocs must also adhere to any re-training requirements imposed by their funding source (see Q34).

**34) Do any of the federal funding agencies require RCR re-training?**

Answer: Yes. According to [the NIH](#), "Reflection on responsible conduct of research should recur throughout a scientist's career: at the undergraduate, post-baccalaureate, predoctoral, postdoctoral, and faculty levels ... Instruction must be undertaken at least once during each career stage, and at a frequency of no less than once every four years." Thus, PIs of [covered NIH projects](#) are required to develop an RCR training plan that addresses the re-training issue and ensure that their trainees adhere to that plan.

**PRINCIPAL INVESTIGATOR / PROJECT DIRECTOR (PI) RESPONSIBILITIES**

**35) If I am a PI, what are my pre-award responsibilities relating to RCR?**

Answer: It is the responsibility of the PI of [a covered project](#) to complete the [RCR Project Plan Addendum to the Sponsored Programs/Research Proposal Authorization Routing Form](#) at the time an applicable proposal is submitted. This Plan should indicate which instruction method(s) will be used for those individuals who are appointed to the project and are required to complete RCR training. It shall become part of the project file in the Office of Sponsored Programs (OSP).

**36) If I am a PI, what are my post-award responsibilities relating to RCR?**

Answer: It is the responsibility of the PI of [a covered project](#):

- To ensure all applicable trainees engaged in research are informed of the requirement and that the requirement has been met;
- To provide mentoring through discussions of RCR topics and through oversight of the trainees' research;
- To retain documentation in the project file of certain types of in-person RCR training events (see Q40 and Q41);
- To certify on an annual basis that all students and postdoctoral researchers funded by the project are in compliance with RCR training requirements; the Annual RCR Certification must be made via the OSP Deliverable System (see Q37); and
- If a covered NIH project, to prepare a plan that addresses the re-training requirements (as described in Q34).



**37) What is an RCR deliverable and how do I complete it?**

Answer: The RCR deliverable is an annual certification from the PI to OSP asserting that as of time of the certification, the in-person RCR training requirements for the award have been met.

Click through the link in the email received from OSP, in the Deliverables tab of the Contract Information System, or in the Deliverables portlet of the “My Pages” section of GTCrossroads. If all employees are in compliance with the RCR training requirement, check the box which states “I certify that all of the students (undergraduate, graduate) and postdoctoral fellows funded by this project have complied with the Georgia Institute of Technology Responsible Conduct of Research Compliance Policy”. To learn how to check the RCR training statuses of employees, refer to Q39.

**38) Do all applicable employees have to complete the in-person RCR training before the deliverable can be certified?**

Answer: No. The deliverable can be certified as long as employees for whom the in-person RCR training is due at the time of certification have completed the training. Any other applicable employees who have not yet completed the in-person training are still required to do so; their training should be certified during the next annual certification cycle.

**39) How can a PI check whether research team members have completed RCR training?**

Answer: There are a few ways to check the RCR training records, including an RCR status report of all employees who have charged to a PI’s RCR-flagged projects. For more information, refer to the [Checking RCR Training Status webpage](#).

**40) Does the PI need to keep records of the online CITI RCR training course completions?**

Answer: In general, no. Records of the CITI RCR course completions are maintained in Banner and in the Research Education training system. If a funding source requests a copy of the CITI RCR course completion certificate, the person who took the course can [obtain it through CITI](#).

**41) Is the PI required to keep records of in-person RCR training in the project file?**

Answer: Retaining documentation of in-person training that has been taken to satisfy the RCR Compliance Policy is the responsibility of the PI **unless** the training has been completed through an [OSP approved RCR training event](#) or through [an approved RCR course](#). OSP approved RCR training events and RCR courses will be documented in the Research Education training system; RCR courses will also be documented in Banner.

**42) Which kinds of in-person RCR training events would the PI need to document in the project file and what type of documentation is needed?**

Answer: Training events which would require documentation from the PI include covering RCR topics in a course that has not been formally approved for RCR credit, or having a research team meeting or a discussion between the PI and the trainee about an RCR topic (for example, mentoring). At a minimum, the PI needs to retain a list of the RCR topics discussed, the date and approximate amount of time dedicated to each topic covered, and a record of who attended the event.

**43) I am a PI and want to satisfy the RCR in-person requirement for my trainees through research team meetings and discussions. How do I accomplish this?**

Answer: The in-person training can cover any of the [RCR topic areas](#) that are related to the trainees' research. A variety of [online resources, including case studies](#), may be helpful for having discussions about RCR. You can also contact [Dr. Jason Borenstein](#) to discuss possible training options.

## **PENALTIES FOR NON-COMPLIANCE**

**44) What are the potential penalties for students and postdocs who do not adhere to the training requirements in the RCR Compliance Policy?**

Answer: Non-compliance on the part of any employed student or postdoctoral researcher may result in the termination of employment and shall result in the disallowance of salary and any associated expenses charged to the sponsored project. Cases of student non-compliance may also be referred to the Dean of Students for additional disciplinary action. Non-compliance on the part of any NSF Graduate Research Fellow shall result in the failure to certify the Fellow's Satisfactory Academic Progress and may result in the termination of the Fellowship.

**45) What are the potential penalties for faculty and staff who do not adhere to the training requirements in the RCR Compliance Policy?**

Answer: Non-compliance by faculty or staff on a USDA NIFA project shall result in the disallowance of salary and any associated expenses charged to the sponsored project. Non-compliance by the PI on a USDA NIFA project may also result in the removal of the PI from the project and the appointment of a replacement PI.

## **CONTACT INFORMATION**

**46) Who should I contact if I have questions about the RCR Compliance Policy?**

Answer: Judy Willis ([judy.willis@gatech.edu](mailto:judy.willis@gatech.edu)) or refer to the [RCR website](#).