

**Claremont McKenna College**  
**Policy on Responsible Conduct of Research (RCR)**  
**For NSF Sponsored Research**

In order to ensure that the training of future scientists and researchers in the United States incorporates appropriate efforts to provide education in the responsible and ethical conduct of research, Section 7009 Of the America COMPETES Act mandates that beginning on January 4, 2010, the National Science Foundation (NSF) “require each institution that applies for financial assistance from the Foundation for science or engineering research or education describe in its grant proposal a plan to provide appropriate training and oversight in the responsible and ethical conduct of research to undergraduate students, graduate students, and postdoctoral researchers participating in the proposed research project.”

Claremont McKenna College endorses this effort to properly prepare students for engagement in responsible and ethical conduct in research and has enacted the following policy to meet this goal and to comply with NSF grant requirements.

**NSF Mandated Institutional Responsibilities for RCR**

- a) 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. As noted in GPG Chapter II.C.1e, institutional certification to this effect is required for each proposal.
- b) While training plans are not required to be included in proposals submitted to NSF, institutions are advised that they are subject to review, upon request.
- c) An institution must designate one or more persons to oversee compliance with the RCR training requirement.
- d) 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 conduct of research.

**CMC Policy on RCR for all Faculty, Students, and Postdoctoral Researchers Participating in NSF Sponsored Research and Training Projects**

In order to prepare students and postdoctoral researchers as responsible and ethical researchers, the College has instituted PREPAIR (Program for Responsible and Ethical Preparation As Informed Researchers). PREPAIR requires that all NSF-supported undergraduates, graduate students, and postdoctoral researchers prior to participating in any NSF funded grant activity complete approved PREPAIR training. This applies to students who receive wages, academic credit, or work as volunteers. PREPAIR training for NSF grants consists of two components: First, successful completion of an appropriate on-line tutorial in RCR must occur prior to receiving support from an NSF grant. The PI and the Office of Sponsored Research will jointly determine which modules are appropriate. Currently, this requirement must include successfully completing appropriate RCR discipline specific areas such as Social and Behavioral Research, Humanities Research, Biomedical Research, or Physical Sciences Research at the CITI (Collaborative Institutional Training Initiative) website at the University of

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Miami at [www.citiprogram.org/](http://www.citiprogram.org/), or successful completion of the three on-line modules created by the Center for Materials and Devices for Information Technology Research at [www.responsible-research.org/](http://www.responsible-research.org/), or comparable on-line training. Second, PIs leading the NSF sponsored research projects should engage in on-going mentoring of students and postdoctoral researchers during the period of the grant to provide regular guidance with respect to RCR issues such as authorship and publication practices, peer review, stewardship of data, lab procedures, examples of research misconduct, conflicts of interest, IRB issues, policies if appropriate regarding human subjects including informed consent and animal welfare. Mentors should also provide insights regarding proper mentor/ trainee relationships and collaboration.

The Office of Sponsored Research has prepared a form to be signed by appropriate faculty, PIs, students and postdoctoral researchers indicating that the student or postdoctoral researcher has successfully completed the on-line training component of the PREPAIR program and that the appropriate PI mentoring will take place during the grant activity. This form is to be signed and submitted to the Sponsored Research Office which will maintain appropriate files for documentation purposes. When the PI submits an annual report to the NSF, a separate brief report specifying what student and or postdoctoral mentoring has taken place should also be filed with the Office of Sponsored Research (but not with the NSF) which will maintain the report for documentation purposes.

The Institutional Officers responsible for RCR and the PREPAIR program are the Director of Sponsored Research, the Vice President for Special Projects, the Dean of Keck Science and the Dean of the Faculty.

The College maintains a separate but similar policy for NIH grants.