

SIENA COLLEGE PLAN for TRAINING UNDERGRADUATES IN THE RESPONSIBLE CONDUCT OF RESEARCH

Background: Pursuant to the 2007 America COMPETES Act, the National Science Foundation has adopted a new certification requirement that becomes effective January 4, 2010. The new NSF Grant Proposal Guide states: “When submitting a proposal to NSF, the Authorized Organizational Representative is required to complete a certification that the institution has a plan 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.” The plan must also include a system to verify that the training has occurred. The plan does not have to be submitted with proposals, but NSF could request it at any time – and NSF could audit compliance. Currently, institutions are free to develop their own plans, and at present there are no NSF-recommended models.

1. Faculty Principal Investigators (PIs) are ultimately responsible for ensuring that student researchers involved in their NSF funded research receive appropriate training. The Siena College Proposal Approval Form requires a signature (in the Research Issues section) from any PI who submits an NSF proposal that requests funding for undergraduate students. Initializing this section indicates that the PI agrees to assume responsibility for the appropriate RCR training of his/her student researchers.
2. RCR (Responsible Conduct of Research) training will be required for all undergraduates receiving wages (or working as volunteers) or receiving academic credit for participating in NSF-funded research. Training must be completed within the semester or summer that the undergraduate begins work on the NSF-funded research. RCR training will be documented on a form developed for that purpose, signed by both the PI and the undergraduate. This RCR form will be maintained by the Office of the Assistant Vice President for Academic Affairs. RCR training will include the following components:
 - a. Each student must successfully complete the appropriate CITI* module of RCR training. This requirement can be waived by the Assistant Vice President for Academic Affairs for students who have successfully completed an RCR workshop (at Siena or another institution) designed to satisfy NSF’s training requirement or other comparable training; the AVPAA will specify what constitutes appropriate documentation in these cases. Successful completion will be documented by attaching to the RCR form a certificate generated by the online training program or by other documentation acceptable to the AVPAA.
 - b. PIs will certify on the RCR form that the student has received RCR training appropriate to the research and discipline.
3. PIs will give the AVPAA and/or Grant Monitoring Assistant periodic updates listing the students participating in research. The AVPAA and/or Grant Monitoring Assistant will facilitate this process by sending reminder emails to all faculty who are PIs on NSF grants at the beginning of each semester and before summer research begins.
4. The Siena College academic deans may amend this plan at any time after consultation with the Vice President for Academic Affairs and AVPAA. Details of any amended plan will be sent to all faculty with NSF grants, the AVPAA, and the deans and will be posted on the AVPAA and College Counsel websites. At a minimum, the plan will be reviewed and updated annually, no later than July 1 of each year (beginning July 1, 2010).
5. The AVPAA, in consultation with the deans, will make decisions on a case-by-case basis about students whose only participation in NSF funded research falls into one of the following situations:
 - the active NSF grant funds equipment used in courses to provide research training
 - the active NSF grant funds research that is incorporated into the research training provided to students in a course
 - an individual that does not fall under the NSF Grant Proposal Guide definition cited above