

**University of Maryland, College Park (“UMD”)
Fulfilling National Science Foundation (“NSF”)
Responsible and Ethical Conduct of Research (“RECR”) Training Requirements**

FREQUENTLY ASKED QUESTIONS (FAQs)

August 2023

Brief Overview

The National Science Foundation Proposal & Award Policies & Procedures Guide ([NSF PAPPG 23-1](#)) included changes to the existing requirements regarding training in the “Responsible and Ethical Conduct of Research” (“RECR”) (at times otherwise referred to as the “Responsible Conduct of Research” or “RCR”). Institutions that submit proposals to the National Science Foundation (“NSF”) *on or after July 31, 2023* must now certify that they have [a plan in place](#) to provide appropriate training and oversight in RECR for *faculty and other senior personnel* (in addition to the populations with a pre-existing training requirement: undergraduate students, graduate students, and postdoctoral researchers) supported by the proposed research project, and such training must include *mentor training and mentorship*. At present, the NSF does not require training plans to be included in proposals; however, those plans are subject to review upon request.

The University of Maryland, College Park (“UMD”), is developing a comprehensive and customized responsible conduct of research program called “*RCR@UMD*” which, at a programmatic level, addresses the aspect of the revised NSF requirements that training “should be effective and must be appropriately tailored to the specific needs and circumstances at each institution.” A comprehensive RCR@UMD catalog of courses is scheduled to be available in full in early 2024, and will include extensive treatment of a variety of RCR-relevant topics in order to ensure that a culture of research integrity is broadly fostered across our research enterprise. UMD prioritized preparing two courses in the RCR@UMD catalog (“[RCR Overview](#)” and “[Mentor/Mentee Responsibilities and Relationships](#)”) that specifically address the revised NSF requirements and cover immediate regulatory needs for our institution and our research community. A [detailed instructions guide](#) was also released to guide impacted individuals in completing the requisite courses. Information about the NSF PAPPG requirements and similar requirements from other funding agencies, course links, and additional information are provided on the Office of Faculty Affairs [Research Integrity “Education” webpage](#).

The following Frequently Asked Questions (FAQs) result from a compilation of questions and answers developed in the days following the release of the revised NSF requirements.

Q: How does this revised responsible conduct of research (RCR) requirement affect those with current, active NSF awards?

RECR (or RCR) training has *already been required* for all undergraduate students, graduate students, and postdoctoral researchers participating in research supported by NSF funds since 2010. The new requirement from NSF requires that institutions that submit proposals to the NSF *on or after July 31, 2023* certify that they also have a plan in place to provide appropriate training and oversight in RECR for *faculty and other senior personnel as well*, with a focus on *mentor training and mentorship*. Impacted individuals must complete the requisite training prior to the funding of any impacted award.

While we are *not currently requiring that all faculty and senior staff on active NSF awards take the requisite training*, our intention for the RCR@UMD initiative is to provide holistic RCR training for our entire research community, and so everyone is strongly encouraged to take RCR@UMD training.

Q: Is the training required at the proposal or the award stage? Can the training be completed after the proposal is submitted, but prior to the actual acceptance of the award? What happens if an award is announced but the employee has not yet completed the training?

As stated in the email: *Faculty, senior personnel, undergraduate students, graduate students, and postdoctoral researchers participating in research supported by NSF must complete the requisite training prior to the funding of any impacted award*. If the award is announced and the employee has not completed the training, they must take it immediately before the award may be set up and the funds disbursed.

Q: How does this impact NSF awards that come in after 7/31/23 but were submitted before that date?

NSF awards that were submitted before 7/31/23, even if they arrive after 7/31/23, are not impacted. We are not currently requiring that all faculty and senior staff on active NSF awards take the requisite training.

Q: If an employee has already taken the CITI training, do they need to also take the RCR@UMD training?

Individuals who have completed the current CITI training within the last three years (prior to 8/1/23) do not need to complete any new training. As their certification expires, however, they will need to complete the new RCR@UMD training courses.

Q: These courses satisfy NSF requirements and are required for folks participating in NSF research. Are they required for anyone else or only recommended?

Individuals who have completed the current CITI training within the last three years (prior to 8/1/23) do not need to complete any new training. As their certification expires, however, they will need to complete the new RCR@UMD training courses.

It is important to note that our intention for the “RCR@UMD” initiative is to provide holistic RCR training for our entire research community. Regardless of whether the training becomes required, we strongly encourage all individuals participating in research at UMD to take these RCR training courses.

Q: Does this requirement apply to non-paid faculty and senior personnel on NSF projects?

The NSF PAPPG 23-1 states that the requirement applies to the aforementioned categories of individuals “who will be supported by NSF to conduct research.” The NSF PAPPG 23-1 executes the amended language of the America COMPETES Act, which now states that the requirement for RECR training applies to “undergraduate students, graduate students, postdoctoral researchers, faculty, and other senior personnel *participating* in the proposed research project.” In other words, the NSF has not spoken to the question of paid or unpaid appointments as determined by the institution; rather, the focus of the decision on whether the training requirement applies is on *participation* in a NSF-funded project, and so we consider this to apply to non-paid faculty if they meet this criteria.

Q: How is NSF defining “senior personnel” and how is UMD defining it by extension?

Again, the NSF PAPPG 23-1 states that the requirement applies to the aforementioned individuals “who will be supported by NSF to conduct research” and executes the amended language of the America COMPETES Act, which refers to individuals “*participating* in the proposed research project.”

For the purposes of this agency-specific requirement, we look to the NSF’s definition of “senior personnel”: (1) PIs/co-PIs -- “the individual(s) designated by the grantee and approved by NSF who will be responsible for the scientific or technical direction of the project”; and (2) “Faculty Associates (faculty members)” -- “an individual other than the Principal Investigator(s) considered by the performing institution to be a member of its faculty or who holds an appointment as a faculty member at another institution, and who will participate in the project being supported.”

Q: We currently have a Payroll and Human Resources (PHR) administrative report called “Responsible Conduct in Research.” Will this report continue to be updated so we can use it as a guide to track those employees who have completed the training as well as those who need to complete the training? How will tracking and reporting work going forward?

First, for clarity, our announcement regarding the revised NSF requirements and our new RCR@UMD training options only present two changes to any existing approaches to tracking and reporting the existence and completion of RCR training requirements:

- 1- The population to which existing NSF training requirements apply has expanded to include faculty and senior personnel.
- 2- All individuals who are supported by or participate in NSF research have a new training option and way to certify completion.

These changes do not impact how RCR training was managed or tracked within your units. The two RCR@UMD courses that were just released simply provide a new method by which training may be completed and certified (similar to that provided by the Collaborative Institutional Training Initiative, or [CITI](#)).

We have met with the individuals who manage the PHR and CITI reports to make sure that the correct individuals are being directed to the new programming. In order to view the list of individuals impacted by RCR training requirements, each departmental administrator must request the RCR administrative report within PHR; and the report that is run will generate a list of individuals who require RCR training based on NSF's new criteria.

Please note that we have been and are currently working with the ELEVATE Workday Learning and Reporting teams to make sure that there will be robust and seamless RCR tracking at an institutional level once Workday is implemented at UMD.

Q: Are the first two installments of RCR@UMD representative of other course materials that are being planned for the program?

The first installments of RCR@UMD (“RCR Overview” and “Mentor/Mentee Responsibilities & Relationships”) were issued in their current form in order to have these additional, institutionally tailored training options available in connection with the NSF PAPPG changes and to in turn better cover urgent and immediate regulatory needs for our institution and research community members. As we further develop our RCR@UMD content, we intend to include an enhanced, multi-modal approach to the delivery of the foundational content that you see reflected in these first installments. (Please note that the mentorship course does have accompanying audio already.) In addition, existing courses will be reviewed on a regular basis and replaced with updated versions as needed to ensure that the content remains current with any developments in related regulatory, institutional policy, or RCR curriculum considerations.

Q: If I am teaching a course on campus that I believe is relevant (like a course on research ethics, for example), is it possible to officially have that course “count” (in whole or in part) toward the responsible conduct of research requirements? What is the process by which courses are assessed for suitability?

Ultimately, yes, we do intend to establish a process for review and approval of existing courses that may satisfy the new and existing funding agency RCR requirements. We are currently working on a review, approval, and tracking process to enable this, which we hope to have ready by early fall 2023.