RESPONSIBLE CONDUCT OF RESEARCH (RCR)

The National Science Foundation (NSF) has required institutions provide the appropriate training and oversight in responsible and ethical conduct of research to undergraduate students, graduate students, and postdoctoral researchers participating in a funded research project. **All grants awarded for applications submitted on or due on or after January 4, 2010 to conduct research must comply with this requirement.** Compliance to this requirement may be fulfilled through an online course and in-person workshops.

In response to NSF’s requirement, Rutgers has proceeded with the following:

1) Rutgers has contracted with the Collaborative Institutional Training Initiative (CITI) to provide online educational modules (https://www.citiprogram.org) that fulfills part of the training requirement for undergraduate and graduate students and postdoctoral researchers who receive NSF funds (support from salary and/or stipends to conduct research on NSF grants). Course curriculum selection will be relevant to one’s field of study. The course selections are Biomedical Responsible Conduct of Research Course, Social and Behavioral Responsible Conduct of Research Course, Physical Science Responsible Conduct of Research Course, and Humanities Responsible Conduct of Research Course.

2) Topical workshops on Responsible Conduct of Research are available on the New Brunswick campus. The topics include: Research misconduct; Management of data and responsible authorship; Mentoring and peer review; Collaboration and conflict of interest. Registration for these workshops is done through the Rutgers University Human Resources workshops website (https://uhr.rutgers.edu/profdev/script/AllWorkshop.asp).

3) For FY 2011 undergraduate students, graduate students and postdoctoral researchers that are required to participate in RCR training should attend the workshops in New Brunswick. The Rutgers-Camden College of Arts and Sciences is investigating alternatives for the campus in FY 2012.

CITI - Registration

**Registration Site:**
https://www.citiprogram.org/

Please be sure to do the following when you register on CITI:

- Select Rutgers University as the institution.

- Use your RUTGERS NET-ID as your username. If you receive a message indicating that the NET-ID is already in use in the CITI system, use your full Rutgers e-mail address as the username.

- Your Rutgers e-mail address must be used as the

PROMOTING OBJECTIVITY IN RESEARCH

As of October 1, 2010, the Rutgers University Policy “Instructions for Handling Significant Financial Interest Disclosures for PHS and NSF Sponsored Projects” 1995 was replaced by Promoting Objectivity in Research.

The Promoting Objectivity in Research policy is necessary as the federal requirements are different from the State’s ethic regulations or the New Jersey Conflict of Interest statute regarding financial and outside employment disclosure obligations. This new policy provides guidelines for investigators who are seeking or already have funding from Public Health Service (PHS) sponsors and the National Institutes of Health (NIH). The following link provides a list of other sponsors that this policy applies to: http://www.hhs.gov/open/contacts/index.html#od.

The following excerpts from the Promoting Objectivity in Research policy are of great importance and need to be noted:

- “A "direct or indirect ownership interest” includes not only that of the Investigator but, also that of his/her spouse, domestic partner or dependent children.”

- “Financial Interests Requiring Disclosure

The Investigator determines what information is, or is not, related to their research. Required disclosures include:

- Salary (not from Rutgers) or other payments for services (e.g. Consulting fees and honoraria),

- Equity interests (e.g. stocks, stock options other ownership interests),

- Intellectual property rights (e.g. patents, copyrights, and royalties other than royalties paid to the researcher by Rutgers)
An aggregated equity interest of the Investigator that exceeds more than 1% ownership interest in any single entity OR meets or exceeds $10,000 according to standards of fair market value; received in the last 12 months. or more.

- Salary (aside from Rutgers), royalties, or other payments that when aggregated for Investigator over the next 12 months is expected to be $10,000

Financial interests that do not need to be disclosed include:

- Salary, royalties, or compensation from Rutgers
- Income from seminars, lectures, teaching engagements sponsored by non-profit entities
- Income from service on advisory committees or review panels for non-profit entities
- An aggregated equity interest of the Investigator that does not constitute more than 1% ownership interest in any single entity OR does not meet or exceed $10,000 according to standards of fair market value; received in the past 12 months
- Salary, royalties, or other payments that when aggregated for Investigator over the next 12 months are expected not to meet or exceed $10,000.

- "Non-Financial Conflicts of Interest
Investigators may have responsibilities or obligations to outside entities that are non-financial in nature, but could be perceived as affecting the objectivity of the research. An example would be a non-compensated management position or a Board seat in an entity active in the Investigator’s area of research. These obligations also need to be disclosed and managed by the university.”

Rutgers is avoiding the use of the more common term “financial conflict of interest” to stress that relationships with industry and commercialization of technology are not activities that should be avoided. Rather, they need to be disclosed and conducted in such a way as to insure that financial interest does not affect the conduct of the research. Identification of a financial interest is not evidence of misconduct or bias. Disclosure creates the opportunity to manage, reduce, or eliminate even the appearance of bias. Rutgers procedures and online disclosure forms for the Promoting Objectivity in Research Policy can be found at http://vpr.rutgers.edu/pro.

Current applicants are required to file the online disclosure forms before proposals are submitted.

NATIONAL SCIENCE FOUNDATION: DATA MANAGEMENT PLANS

The National Science Foundation (NSF) now requires that all proposals include a data management plan that is a two-page supplementary document. The change addresses the need in an era of data driven science. It enables researchers to work together and communicate with one another more effectively. Data management plans are also consistent with NSF’s mission and with U.S. policymakers to ensure that any data obtained by federal funds are accessible to the general public. NSF’s Fastlane system will not accept a proposal submission that does not have a Data Management Plan. More information about this is available at http://www.nsf.gov/news/news_summ.jsp?cntn_id=116928&org=NSF&from=news.

NATIONAL INSTITUTES OF HEALTH (NIH) SUBMISSION REMINDER – ELIMINATION OF THE ABILITY TO CORRECT ERRORS AND WARNINGS AFTER THE SUBMISSION DEADLINE

Starting January 25, 2011 the ability to correct errors and warnings after the submission deadline will no longer be possible. For more information regarding the elimination of the error correction window go to http://grants.nih.gov/grants/guide/notice-files/NOT-OD-10-123.html. In order to make corrections, applications should be submitted early on eRA Commons so that if it is necessary to make a correction it can be done before the application is auto-validated by the system.
FEDERAL FUNDING ACCOUNTABILITY AND TRANSPARENCY ACT (TRANSPARENCY ACT OR FFATA)

There have been changes to FFATA regarding the sub-award reporting requirements. As of October 1, 2010 all new federal grants, agreements, etc. of $25,000 or more with first-tier subs of $25,000 or more must report first-tier sub-award information and executive compensation information. The same is required for all new federal contracts of $550,000 or more with first-tier subs of $25,000 or more. Effective March 1, 2011 the new reporting requirements will apply to all new federal contracts of $25,000 or more with first-tier subs of $25,000 or more. Reports will be due at the end of the month following the month that the sub-award was created (i.e. the sub-award was created on 11/11/10 therefore Rutgers University must report by 12/31/10).

PRE-AWARD SPENDING

Please make yourself aware of Rutgers University’s Division of Grants and Contract Accounting’s (DGCA) policy regarding pre-award spending. An Institutional Prior Approval (IPAS) Form must be used to request HOLD accounts and pre-award spending. IPAS forms are available on the DGCA website at http://postaward.rutgers.edu/new_forms.htm. A separate IPAS form must be filled out for each action if a HOLD account and pre-award request is needed. A pre-award spending request must be submitted to DGCA before work on a project begins even if a HOLD/grant account has been established.

SPONSORED RESEARCH SUBMISSION PROCEDURES AND TIMELINE REMINDER

All grant/contract/sub recipient award applications and all supplemental requests submitted to corporate, private, foundation, not-for-profit, state or other municipality, and federal sponsors must be processed through the Office of Sponsored Research.

In order to assist faculty and staff effectively the following procedures and timelines must be adhered to:

• Contact Camie Morrison in the Office of Sponsored Research at least 30 days in advance of a grant submission deadline (include program announcement and deadline information).
• Seek budgetary advice from or submit budgetary information to the Office of Sponsored Research at least 10 days before submission deadline.
• Letters of support from the Dean and/or the Chancellor’s Office must be requested at least 10 days prior to the submission date. This will allow time for the Dean or Chancellor to review the proposed project and finalize the support letter.
• Submit a completed endorsement package to the Office of Sponsored Research no later than five days before the submission date to ensure enough time for approval signatures. The endorsement package must include:
  ✓ the endorsement form and project abstract (endorsement forms are available at http://orsp.rutgers.edu/downloads/Endorsement/EndForm_JS.pdf)
  ✓ a copy of the proposal
  ✓ the project budget
  ✓ the cost share budget template must be included for applications which require matching funds (the budget template is available at http://orsp.rutgers.edu/Costshare/default.php)

SUBMISSION DEADLINE REMINDER!

Please note that it is imperative that you submit a complete endorsement package to the Office of Sponsored Research at least five days in advance. Electronic proposal submissions through Grants.gov and NSF Fastlane have had issues recently due to their systems. In order to ensure that proposals are submitted on time and will not be rejected, it is best to be prepared to submit a few days in advance of the actual submission deadline. It is important not to wait until the last day or two.