Marquette University
Responsible Conduct of Research Plan

Effective January 4, 2010, the National Science Foundation began implementing Section 7009 of the America Competes Act (42 U.S.C. 1862o-1). This regulation requires that each institution that applies for funding from NSF has a plan to provide appropriate training and oversight in the responsible and ethical conduct of research for undergraduate students, graduate students, and postdoctoral researchers participating in the proposed research project.

The National Institutes of Health (NIH) updated its requirement for instruction in the Responsible Conduct of Research (RCR) in NIH notice number NOT-OD-10-019, dated November 24, 2009 and again in NOT-OD-22-055, dated February 17, 2022. NIH requires that all trainees, fellows, participants, and scholars receiving support through any NIH training, career development award (individual or institutional), research education grant, and dissertation research grant must receive instruction in responsible conduct of research. This policy took effect with all new and renewal applications submitted on or after January 25, 2010, and for all continuation (Type 5) applications with deadlines on or after January 1, 2011. This Notice applies to the following programs: D43, D71, F05, F30, F31, F32, F33, F34, F37, F38, K01, K02, K05, K07, K08, K12, K18, K22, K23, K24, K25, K26, K30, K99/R00, KL1, KL2, R25, R36, T15, T32, T34, T35, T36, T37, T90/R90, TL1, TU2, and U2R. This policy also applies to any other NIH-funded programs supporting research training, career development, or research education that require instruction in responsible conduct of research as stated in the relevant funding opportunity announcements.

The Office of the Vice President for Research and Innovation at Marquette University, to meet these requirements and any other such requirements mandated by other sponsors, has developed an implementation plan. The Dean of the Graduate School is the Responsible Conduct of Research Coordinator and the Vice President for Research and Innovation is the Research Integrity Officer. The two units have worked together to develop an implementation plan which is in compliance with both sets of regulations referenced above. Areas to be covered in the plan include:

- Data Acquisition and Management
- Secure and Ethical Data Use
- Mentor-Trainee Relationships
- Publication Practices and Authorship
- Peer Review Practices
- Collaborative Research, including International Collaborations
- Protection of Human Subjects
- Research Involving Animals
- Conflict of Interest and Commitment
- Ethical Decision Making in Research
- Safe Research Environments
- Research Misconduct

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Although these are the main subject matter for the modules, it is anticipated that the following topics be interwoven into the modules: Plagiarism; Intellectual Property; Lab Management; Financial and Personnel Management; Ethical Deliberation and Training; and Whistleblowing.

RCR content will be delivered via a hybrid of on-line and face-to-face sessions. Participants will access content via the Collaborative Institutional Training Initiative (Citi) Responsibility Conduct of Research (RCR) Basic Course online modules. They will demonstrate content mastery by successfully completing quizzes associated with each of the thirteen topics (approximate completion time 4-5 hours). Participants will also be required to attend three 1.5 hour (4.5 hours total) workshops consisting of case study analysis and discussion. To prepare for each face-to-face workshop, participants will access relevant cases and discussion questions through the university’s course management system. The online modules will be available on-demand and the face-to-face workshop series will be offered multiple times per year. Differentiated curriculum is available for postdoctoral students and faculty trainees who are required to have RCR training.

An overview of each of the topics in the Citi RCR Basic Course is available in the Citi RCR Basic Course Catalog available at – https://www.citiprogram.org/citidocuments/forms/Responsible%20Conduct%20of%20Research%20Catalog.pdf

Students participating in a National Science Foundation-supported Research Experiences for Undergraduates (REU) Site program will typically complete Responsible Conduct of Research training as a part of the REU Site programming. The RCR curriculum developed and delivered by the Graduate School is the only curriculum recognized by Marquette as being compliant with federal and other grantor guidelines. Undergraduate training programs can supplement with additional materials/training as they see fit once the base RCR curriculum is delivered by the Graduate School.

At the proposal stage for NSF applications, in order to be in compliance with the requirement, **Marquette Principal Investigators (PIs) are being requested to include the following paragraph in their proposal** (there is no “required” spot; it could be included in a section discussing broader impacts):

**In accordance with the America COMPETES Act, Marquette University has 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. The plan is available for review upon request.**

If awarded, PIs must ensure that any grant-funded students, postdoctoral researchers or others as identified by NSF, NIH or any other sponsor with a mandate complete the institutional RCR training. Note that these individuals do not need to complete the training before they can begin work. Instruction does however need to be taken at least once during each career stage (e.g., a
graduate student must take the RCR training as a graduate student, even though he or she may have had RCR training as an undergraduate). Further, RCR training must be completed at a frequency of no less than once every four years.

Also, be advised that the RCR requirement pertains to all subawardees. A plan must be in place to ensure that students at other universities either comply with their institution’s requirements and provide proof of completion, or participate in Marquette’s RCR training program.

While this requirement pertains only to students and postdoctoral researchers participating in NSF awards and trainees participating in select NIH and other awards, all undergraduate and graduate students and postdoctoral researchers who participate in research are encouraged to participate in this training.

This plan is subject to change as the university progresses along the plan of compliance.