

SMITH COLLEGE.

Responsible Conduct of Research Policy and Training Plan

Approved by: *Provost*

Responsible Office: *Office of the Provost; Grants & Sponsored Research Office*

Responsible Administrator: *Associate Provost; Director, Grants & Sponsored Research*

Date Established: 9/16/2025

Date Last Revised: NA

Purpose Statement

The purpose of this policy is for Smith College to maintain compliance with both state and federal regulations and guidelines aimed at ensuring integrity and accountability in research practices. In addition, to fulfill funding requirements for RCR training for Designated Researchers as mandated by federal agencies such as the National Institutes of Health (NIH) and the National Science Foundation (NSF).

Ethical and responsible conduct of research is critical for excellence, as well as public trust. Consequently, education in the responsible and ethical conduct of research is considered essential in the preparation of future researchers. The NSF, the primary source of Smith College's federal funding, advocates a similar philosophy: "The responsible and ethical conduct of research (RECR) is critical for excellence, as well as public trust, in science and engineering." Similarly, the NIH holds as a core principle the belief that "responsible conduct of research is a fundamental element of research training."

A campus-wide environment pertaining to the responsible and ethical conduct of research requires researchers to have the knowledge, skills, and tools to enable them to be responsible for their research conduct. A basic understanding of the responsible conduct of research can be obtained and documented through Smith's affiliation with the Collaborative Institutional Training Institute (CITI) Program (<https://www.citiprogram.org/>). Smith offers its faculty, staff, and students free access to CITI's various topic areas and corresponding certifications that hold widely recognized value within the research space. For students, obtaining CITI certification is an excellent indicator to future employers that they have knowledge of research ethics and have been involved in substantive scientific work.

In compliance with the National Science Foundation's (NSF) implementation of Section 7009 of the America COMPETES Act (42 U.S.C. 1862o-1), all Designated Researchers supported by NSF to conduct research are required to complete training in the responsible and ethical conduct of research. This applies to proposals submitted on or after July 31st, 2023 and subsequently issued as an award. NSF incorporates the Responsible Conduct of Research (RCR) requirement into the terms and conditions of applicable awards.

Definitions

These definitions apply to terms as they are used in this policy.

Term	Definition
Designated Researcher	All undergraduate students, post-baccalaureate fellows, graduate students, postdoctoral fellows, faculty members, senior personnel, and staff members conducting research

Policy Statement

Responsible Conduct of Research training is required of all Designated Researchers prior to conducting human subjects research, animal subjects research, and/or engaging in NSF- or NIH-funded research. There is an additional research security training requirement for all named grant personnel which must be completed in advance of any grant submissions to NIH and NSF.

Policy Violations

Violations of College policies are adjudicated according to procedures outlined in the Student Handbook and the Employee Handbook, with disciplinary consequences imposed by the adjudicating authority up to and including dismissal. Some offenses are punishable under state and federal laws.

Scope/Responsibilities

Responsibilities:

- For the following policy: All persons who are engaged in research at Smith College
- For enforcement and oversight of policy: Office of the Provost, Associate Provost
- For procedures implementing policy: IACUC Coordinator; IRB Coordinator; Lab Safety and Compliance Director; and Grants & Sponsored Research Office.

Principal investigators and/or project directors who conduct research are responsible for ensuring that undergraduate students, post-baccalaureate fellows, graduate students, postdoctoral researchers, faculty members, and senior/key personnel who participate in their research complete RCR training as needed according to this plan. Principal investigators are also responsible for completing RCR training appropriate to their career stage and as outlined in sponsored research award requirements.

Principal investigators are responsible for completion of the required RCR training and maintaining training documentation of RCR training for all researchers who work under their direction. Principal investigators are, themselves, responsible for completing ongoing RCR training appropriate to their

own career stage and subject matter and for maintaining documentation of this training. For principal investigators conducting externally sponsored research projects, this requires completion of any specific funding agency requirements, as applicable, and may include periodic refresher training.

Principal investigators submitting grants to Public Health Service (PHS) (which includes NIH, FDA, CDC, HRSA, AHRQ, and SAMHSA), NSF, or other funding agencies with RCR requirements, must confirm that they have reviewed and will comply with the College's RCR policy and training plan during the pre-submission internal approval process, via the Jotform routing form administered by Grants & Sponsored Research. The internal routing process must be completed before principal investigators' proposals can be submitted to the funding agency for review.

Procedures

The Smith College CITI Program offers numerous online courses focused on different areas of responsible conduct of research, including: human subjects (Institutional Review Board (IRB) Researchers), animal subjects (Working with the Institutional Animal Care and Use (IACUC), Working with mice in research settings, Working with zebrafish in research settings, Working with amphibians in research, Post-procedure care of mice and rats in research), financial conflicts of interest (Public Health Services Financial Conflict of Interest (PHS FCOI)), and funder-specific (Responsible and Ethical Conduct of Research (RECR for NSF)) courses.

Procedure for Compliance:

RCR training is required for any Designated Researcher before conducting research involving human subjects, regardless of the discipline. This includes secondary data analysis, unless the dataset has been designated by IRB as not human subjects research due to de-identification ([example: UConn IRB guidance for secondary data analysis](#)).

RCR training focused on animal welfare in terms of ethical principles and federal regulations is required for any Designated Researcher before conducting research involving live vertebrate animals or live cephalopods. Training is overseen by the Institutional Animal Care and Use Committee (IACUC). The minimum training required includes completion of the CITI Program course, "Working with the IACUC: Animal Investigators, Staff and Students."

RCR training is additionally required for any Designated Researcher conducting research in any discipline who are paid through NSF grants that are administered by the College. Principal investigators paid through NIH or other PHS agencies are required to complete in-person RCR training for specific award types (see below). This RCR requirement also applies to anyone paid through grants from other funders that require RCR training per the associated funding announcement and/or funding agency guidelines.

Topic Area	CITI Course	Requirement
Human subjects research	IRB Researchers	All Designated Researchers involved with human subjects; IRB requirement
Vertebrate or cephalopod animal subjects research	Working with IACUC & Species-specific course(s)	All Designated Researchers involved with animal subjects; IACUC requirement
NSF funding	Responsible and Ethical Conduct of Research (RECR) for NSF	All Designated Researchers receiving funds from an NSF grant; NSF requirement
National Institutes of Health (NIH) funding	Public Health Service (PHS) Financial Conflict of Interest (FCOI) & IRB Researchers	PHS FCOI required of the principal investigator; NIH requirement. IRB Researchers is required if human subjects are involved; NIH requirement

Specific Funding Agencies

Principal investigators who receive grant funding from PHS or NSF are responsible for complying with Smith College's RCR Policy and Training Plan, as well as any additional requirements from the funding agency. Training must be completed within 60 days (or sooner, if stipulated by the funder) of initial engagement in the sponsored research activity for Smith College to remain compliant with federal requirements. Guidance for complying with PHS and NSF RCR training requirements is provided below. Investigators should contact the Grants & Sponsored Research Office with any questions pertaining to specific funding agency requirements.

Principal investigators should note that all Smith College CITI RCR training courses are valid for four years (with the NSF RCR training course as the one exception), after which point a refresher course is required. CITI account holders will receive email notice in advance of course expiration.

Guidelines

RCR training is *recommended* for all undergraduate students, post-baccalaureate fellows, graduate students, postdoctoral fellows, faculty members, senior personnel, and staff members in research-adjacent disciplines, such as astronomy, biochemistry, biological sciences, chemistry, computer science, engineering, education & child study, environmental science & policy, geosciences, marine science & policy, mathematics, neuroscience, physics, psychology, and statistical & data sciences.

Documentation and Compliance

The Grants & Sponsored Research Office tracks compliance with the RCR Policy and Training Plan for all principal investigators and researchers participating in externally sponsored projects,

according to specific funding agency requirements. IRB and IACUC provide RCR oversight for all projects that include human subjects and animals, respectively.

All externally sponsored principal investigators will work with the Grants & Sponsored Research Office to comply with sponsor-required RCR training during both grant submission and award set-up. Additionally, principal investigators will work with the Grants & Sponsored Research Office to comply with sponsor-required RCR training when adding any undergraduates, graduate students, or postdoctoral researchers to their externally sponsored projects.

Externally Sponsored Research Training Requirements

NSF

[NSF policy](#)

For NSF proposals submitted on or after July 31, 2023, all faculty and other senior personnel named on the proposal are required to complete the CITI program's NSF RCR training before any funding can be awarded. Undergraduates, graduate students, and postdoctoral researchers are required to complete NSF RCR training before participating in any NSF-supported research.

[Research Security Requirements](#)

There is an additional research security training course required for all named grant personnel (e.g., PI, co-I, other senior/key personnel). It is provided through Smith College's Workday system, and must be completed within the prior 12 months in advance of any grant submissions to NSF.

[FCOI requirements](#)

Institutions are responsible for reviewing investigators' Significant Financial Interest. All investigators must complete the SFI Jotform as part of the internal routing process. It is *recommended* that investigators complete CITI's Financial Conflict of Interest training during award set-up and in advance of sponsored research activity, or have completed the FCOI certification in the last 4 years.

DHHS/PHS (NIH, AHRQ, HRSA, CDC, FDA, SAMHSA)

[RCR guidelines](#)

All trainees, fellows, participants, and scholars receiving support through any NIH training grant, career development award (individual or institutional), research education grant, or dissertation research grant must receive instruction in RCR.

Existing NIH policy calls for RCR instruction to be undertaken at least once during each career stage, and at a frequency of no less than once every four years. More than 50% of RCR training for PHS-funded investigators must take place in-person; CITI training can be used for some of the hours but not for the majority. Acceptable programs generally involve at least eight contact hours.

These [guidelines](#) apply specifically to NIH's 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 programs. 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.

FCOI requirements

Institutions are responsible for reviewing investigators' Significant Financial Interest. All investigators must complete the SFI Jotform as part of the internal routing process. Investigators are required to complete CITI's Financial Conflict of Interest training during award set-up and in advance of sponsored research activity, or have completed the FCOI certification in the last 4 years.

Research Security requirements

There is an additional research security training course required for all named grant personnel. It is provided through Smith College's Workday system. All Smith College representatives who are named NIH grant personnel (e.g., PI, co-I, other senior/key personnel) must complete this research security training on an annual basis.

Clinical Trial requirements

If considered a clinical trial by NIH (human subjects, prospectively assigned, influencing outcomes), everyone involved with human subjects on the study directly or through data analysis is required to complete a Good Clinical Practices (GCP) training. This course is available online through the CITI Program or the [Society of Behavioral Medicine](#); many research-focused conferences offer GCP training as an additional workshop.

Related Information

Related Policies:

Policy on Misconduct in Research:

This policy and procedures pertain to the handling of misconduct in research.

Policy link [here](#)

Policy on Academic Financial Conflict of Interest in Research:

This policy outlines the procedures required for federal grantees in regards to financial conflict of interest disclosure and management.

Policy link [here](#)
