Committee on Research Recommendations on the proposed Responsible Conduct in Research Plan

May 7, 2012

The Committee on Research has reviewed the proposed “Responsible Conduct in Research (RCR)” plan and makes the following recommendations to the College Senate:

1. It is imperative that the College implements an RCR plan. An RCR plan benefits the institution in terms of legal protections, compliance with federal regulations, and external funding eligibility. In addition, elements of the proposed plan have the potential to benefit campus individuals engaged in activities guided by the plan through training in ethical conduct and best practices.

2. The Committee supports the main elements of the proposed RCR plan. However, we recommend the following amendments:

   a. The RCR policy should include a plan for periodic review and modification.

   b. The Committee supports the use of the Collaborative Institutional Training Initiative (CITI) program for RCR certification. However, the Committee is concerned that the proposal does not include any measures to ensure the identity of the individuals completing RCR certification training or the integrity of the online training process. For example, other institutions have designated, monitored training facilities. Such arrangements carry an associated cost, however. In the absence of a campus Office of Research or Research Compliance Officer, we recommend that departments oversee any such training at the present time. (SUNY Oneonta RCR Plan, March 2012, page 2, Section 2b)

   c. The language regarding the timing of RCR training certification should be changed from “prior to proposal submission” to “prior to accessing awarded funds”. We find the proposed timeline to be unnecessary and are concerned that it might actually serve to discourage faculty from seeking funding on a short timeline. (SUNY Oneonta RCR Plan, March 2012, page 2, Section 2b, first bullet point)

   d. The policy should allow for transfer of equivalent CITI certification from other institutions if within the proposed 24 month update period. Many research institutions that Oneonta researchers might visit for collaboration and/or access to major resources (instruments, collections, etc.) already participate in this program and require certification of users. The Committee sees no reason why an appropriately trained and certified
individual should have to complete training twice. *(SUNY Oneonta RCR Plan, March 2012, page 2, Section 2b, third bullet point)*

e. The Research Integrity Officer (RIO) and Scientific Misconduct Policy Officer (SMPO) should be two separate individuals, or two individuals should jointly hold each position. *(SUNY Oneonta RCR Plan, March 2012, page 4, Section 8)*

f. We recommend that a training program or summary sheet be developed that provides guidance to faculty on module selection and refers them to the appropriate individual(s) on the RCR contacts list.

3. Finally, we would like to share the following observations in further support of adopting a preliminary RCR policy:

   a. Several Committee members have piloted the CITI training modules or completed CITI certification at another institution, including those relating to studies in the humanities, sciences, and research involving human subjects. We found them to be not overly time-intensive and the material within to provide value even to experts in the field. We encourage colleagues with questions or concerns to preview them as well. [http://www.citiprogram.org](http://www.citiprogram.org)

   b. The professional certification provided by the CITI training is something that will enhance a student’s resume.