I. PURPOSE
To articulate Villanova University’s commitment to the responsible conduct of research and to articulate requirements and expectations of faculty, staff, and students engaged in research in ways that both meet and/or go beyond applicable federal regulations.

“With growing public support for research has come an understandable concern about the way it is conducted. Public funds support roughly one-third of all research and development (R&D) in the U.S. and half of all basic research. Many researchers, therefore, spend a significant portion of their time working for the public. As public servants and also professionals, researchers have clear obligations to conduct their research in a responsible manner” (http://ori.hhs.gov/preface).

Both the National Science Foundation and the National Institutes of Health have instituted requirements related to responsible conduct of research. For example, “The Director shall require that each institution that applies for financial assistance from the Foundation for science and engineering research or education describe in its grant proposal 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” (http://www.nsf.gov/bfa/dias/policy/rcr.jsp). “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” (http://grants1.nih.gov/grants/guide/notice-files/NOT-OD-10-019.html).

II. SCOPE
“Villanova University relies on its faculty to establish and maintain the highest standards of ethical practices in academic work including research. All individuals engaged in research at Villanova University are responsible for adhering to the highest standards of intellectual honesty. Faculty members and supervisors of research personnel (including graduate students) have a special obligation to set an example and create an environment that encourages absolute intellectual integrity” (Villanova University Policy on Misconduct in Science/Research).

III. DEFINITIONS
“Responsible Conduct of Research has been defined as the practice of scientific investigation with integrity” (NIH Notice NOT-10-019). Stanek (2007) states, “In general terms, responsible conduct of research is simply good citizenship applied to professional life” (http://ori.hhs.gov/images/ddblock/rcrintro.pdf).
IV. POLICY STATEMENT

As a part of a broader Research Education Program, Villanova has contracted the Collaborative Institutional Training Initiative (CITI), which provides online training in Responsible Conduct of Research, Conflicts of Interest, and Human Subjects Research. CITI training is required of Principal Investigators and Co-Principal Investigators prior to the submission of a proposal for funding to an external entity through ORA, prior to receipt of support through one of Villanova’s internal research programs (e.g., University Summer Grants, VERITAS Awards, and Villanova Undergraduate Research Fellows), or prior to submission of a protocol to the Institutional Review Board (IRB). Instructions for accessing CITI training are provided on the Office of Research Administration website. CITI training is required as follows:

<table>
<thead>
<tr>
<th>Your role</th>
<th>Responsible Conduct of Research</th>
<th>Conflicts of Interest</th>
<th>Human Subjects Research</th>
</tr>
</thead>
<tbody>
<tr>
<td>Principal Investigator or Co-investigator</td>
<td>X</td>
<td>X</td>
<td>(as needed)</td>
</tr>
<tr>
<td>Faculty conducting research and/or mentoring student research</td>
<td>X</td>
<td>X</td>
<td>(as needed)</td>
</tr>
<tr>
<td>Key Personnel</td>
<td>X</td>
<td>X</td>
<td>(as needed)</td>
</tr>
<tr>
<td>Graduate or Undergraduate Research Assistant</td>
<td>X</td>
<td>X</td>
<td>(as needed)</td>
</tr>
<tr>
<td>Institutional Review Board (IRB) Member or Chair</td>
<td></td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Office of Research Administration Staff</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
</tbody>
</table>

A. **Principal Investigator or Co-Investigator**: Any tenured, tenure-track, or non-tenure track faculty member who is listed or may be listed in the near future as the PI or co-PI on a proposal for a research grant submitted to Villanova’s internal research programs, or to a federal or state agency, foundation, or private company, whether or not (s)he receives financial compensation from the grant.

B. **Faculty conducting research and/or mentoring student research**: Any tenured, tenure-track, or non-tenure track faculty member for whom research is an expectation of their position and/or who mentor/supervise graduate or undergraduate students in research.

C. **Key Personnel**: Non-tenure track research faculty, non-degree seeking researchers (usually but not exclusively Doctoral or Post-Doctoral) and full and part-time research staff who are involved in the design, execution, or reporting of research.

D. **Graduate and undergraduate student researchers**: Beginning January 1, 2015, graduate and undergraduate student researchers who are paid from grant or university research funds to perform research, or who are receiving academic credit to perform research, must
take the CITI training before working on the research. Graduate and undergraduate researchers will receive a separate email on this topic after the final listing of active GA’s is available for spring semester 2015. Principal investigators and faculty mentors/supervisors are responsible for ensuring the compliance of all students working on research under their direction.

V. PROCEDURE
A. CITI Training - Villanova has engaged the Collaborative Institutional Training Initiative (CITI) to provide online training in responsible conduct of research. A minimum score of 80% is required for successful completion of each module. CITI training must be completed every two years.

B. On-Campus Training in Responsible Conduct of Research – Villanova University’s Responsible Conduct of Research Training program goes beyond CITI training. At the beginning of Summer Session I, the Center for Undergraduate Research and Fellowships organizes a half-day responsible conduct of research workshop targeted toward undergraduate students engaged in summer research. Every Fall, the University sponsors a half-day responsible conduct of research workshop targeted toward beginning graduate students across the University. Also in the Fall, the University conducts responsible conduct of research workshops targeted toward beginning faculty.

VI. RELATED INFORMATION/FORMS
Reporting of Possible Violations of Responsible Conduct of Research - Villanova’s process for dealing with possible violations in the responsible conduct of research is detailed in the University’s Misconduct in Science/Research policy. Villanova University employees should be aware of The Notice to Employees of Whistleblower Protections.


VII. HISTORY
4 December 2014 - Announcement of the policy on training in Responsible Conduct of Research, Conflicts of Interest, and Human Subjects Research to all externally funded Principal Investigators in an email from the Associate Vice President for Research and Graduate Programs.

16 January 2015 – As of this date, Principal Investigators and Co-Principal Investigators must have completed CITI training prior to the submission of proposals for external funding or of protocols to the IRB.

VIII. RESPONSIBLE UNIVERSITY DIVISION/DEPARTMENT
Office of the Provost
IX. RESPONSIBLE ADMINISTRATIVE OVERSIGHT

Administrative Oversight Office:
Office of Research Administration
Middleton Hall Rm 1st
800 Lancaster Avenue
Villanova, PA 19085

General Telephone Number: 610-519-4220