

University of the District of Columbia Policy on Responsible Conduct of Research and Research Integrity

The University of the District of Columbia has an institutional responsibility to ensure that research performed under its purview is conducted in a manner consistent with the highest standards of professional integrity.

Responsible conduct of research (RCR) is the phrase used to describe the application of established professional norms and ethical principles in the performance of all activities related to research, regardless of the subject matter. This responsibility applies to research funded by Federal sponsors, by other sponsors, by the University, or performed without funding. The University fulfills this responsibility by providing information, training, and a process for safely reporting and objectively investigating possible research misconduct¹.

Responsible Conduct of Research

The University expects that faculty, staff, and students will conduct research responsibly. This expectation applies to all types of research and research settings, including but not limited to laboratory research; literature research; internet research; field research; research using human subjects or animals; and computer-based, computational, and theoretical research. Faculty and staff will stay current in the issues surrounding the responsible conduct of research in general and in their specific research areas.

Responsible conduct of research is a significant component of professional ethics for disciplines in which research is performed. Departments should include RCR outcomes and instruction in their learning goals, curriculum, courses, and seminars. Faculty members have an important responsibility to educate students at all levels about the ethics and professional norms of research both generally and in their specific disciplines. Part of educating students and supervising their research involves helping them learn the knowledge, skills, and attitudes associated with performing research responsibly and ethically. Students include pre-college students, undergraduate students, graduate students, and post-doctoral fellows.

The University has joined the Collaborative Institutional Training Institute (CITI), located at the University of Miami. CITI offers institutionally tailored on-line courses in the responsible conduct of research. Courses are available for each research area (biomedical, engineering, physical sciences, social and behavioral sciences, and humanities). The CITI courses include tests of knowledge and provide documentation of satisfactory completion.

(1) Each student (undergraduate and graduate) and post-doctoral researcher who conducts research (paid or unpaid) is required to have a foundation of documented training in RCR. This foundational requirement can be met by having the student take and pass (>80%) the appropriate CITI RCR on-line course prior to doing research at the University. The CITI courses are found at www.citiprogram.org. Students must take a refresher course if 2 years or more have elapsed since the previous documented RCR training.

¹ Institutions applying for assistance from the National Science Foundation are required to engage in responsible conduct of research in accordance with section 7009 of the America COMPETES Act (42 U.S.C. § 18620-1) and its corresponding regulations (74 Fed. Reg. 42126-28 (Aug. 20, 2009)).

- (2) Faculty supervising student research shall provide the students with additional mentoring in RCR, as well as in the specific research and analysis protocols and procedures appropriate to the project.
- (3) The University recommends that faculty and staff members engaged in research take the CITI course appropriate to their discipline every 2 years, and provide feedback to the Office of Sponsored Programs to improve the curriculum.
- (4) The Principal Investigators of sponsored research projects are responsible for understanding and fully implementing the specific sponsor's requirements for RCR training for all persons participating in the project, including faculty, staff, students, and other collaborators. The University's foundational training requirement, above, satisfies the National Science Foundation's requirement for student RCR training. If supplemented by at least 8 hours of documented in-person mentoring and/or face-to-face coursework, the required RCR training also satisfies the National Institute of Health's requirement for student training. When sponsors require more than the foundational training, the Principal Investigator is responsible for certifying to the Office of Sponsored Programs the training method, content, and date the sponsor's RCR training requirements are met for each student paid through the grant or contract.
- (5) The Office of Sponsored Programs is responsible for maintaining the CITI membership, maintaining documentation of RCR training, and updating the on-line curriculum with institution-specific content. All documentation demonstrating satisfactory completion of RCR training shall be submitted to the Office of Sponsored Programs.
- (6) For research projects involving human subjects, additional specialized documented training and institutional review of research protocols are required to assure the protection of these subjects. Researchers whose projects involve human subjects must obtain Institutional Review Board (IRB) approval before beginning their work. Obtaining approval may include submitting proof of completion of human-subject-protection coursework found at http://phrp.nihtraining.com. Additional information is available at http://www.udc.edu/irb/.

Research Misconduct

The White House Office of Science and Technology Policy (OSTP) has developed a definition of research misconduct that is accepted by all Federal agencies. OSTP (http://www.ostp.gov/cs/federal_policy_on_research_misconduct) and 42 C.F.R. § 93.103, part of the Public Health Service's policies on research misconduct, define research misconduct as:

"[F]abrication, falsification or plagiarism in proposing, performing or reviewing research or in reporting research results." Fabrication is defined as "making up data or results and recording or reporting them." Falsification is "manipulating research materials, equipment or processes or changing, omitting, data or results such at the research is not accurately represented in the research record." Plagiarism is "appropriation of another person's ideas, processes, results or words without giving appropriate credit." Research misconduct does not include honest error or differences of opinion.

The definition of research misconduct lists fabrication, falsification, and plagiarism as the three types of unacceptable practices that set a "floor," or minimum standard, in research. University faculty, staff, and students engaged in research must understand and avoid these unacceptable practices, and go beyond them consistently to achieve the highest professional standards of responsible and ethical research in their respective disciplines.

The University of the District of Columbia holds all researchers, whether faculty, staff or students, accountable for the conduct of the research they perform. Faculty and staff are responsible for assuring the conduct of research by students they supervise.

- (1) Anyone who observes research misconduct or has evidence of possible research misconduct is obliged to report it to the supervisor, dean, or Associate Provost for Research. The individual receiving the report must convey it promptly to the Associate Provost for Research.
- (2) The University allows individuals to report suspected research misconduct confidentially and protects them from retaliation.
- (3) Any concerns about the integrity of specific research should be directed to the Associate Provost for Research, who is responsible for ensuring that the concern, observation, or suspicion is investigated promptly and objectively, and for reporting the results of the investigation per applicable Federal requirements.
- (4) The University will impose appropriate discipline in cases of substantiated research misconduct by faculty, staff, or students.

For further information, the University's Research Misconduct Policy may be viewed at www.udc.edu/osrp/udc-policy.htm.