

Tracking Responsible Conduct of Research (RCR) Training Compliance for National Science Foundation (NSF)

*Applicable to undergraduate students, graduate students, and postdoctoral researchers

1. Trainee's salary is charged to the NSF award, with the 'earns begins' date signifying the start of their work on the award.
2. Trainee is instructed to complete the required RCR training. While the Principal Investigator (PI) is ultimately responsible for the trainee's compliance, it is advisable for departments/schools/units to communicate training requirements immediately upon the trainee joining the research. Once the first payroll cycle occurs, Northwestern University's training management system, Learn@Northwestern, will generate an email notification to the trainee about RCR training requirements.
 - a. Undergraduate students have **60 days from the 'earns begins' date** to complete the required training. This is achieved by successfully completing the web-based *RCR Course for Undergraduate Students* through the Collaborative Institutional Training Initiative (CITI) program.
 - b. Graduate students and postdoctoral researchers have **1 year from the 'earns begins' date** to complete the required training. This is achieved by successfully completing an instructor-led training (ILT) course at Northwestern, and depending on the trainee's departmental requirements additional web-based training through the CITI program may also be required. (Please see appendix A for list of available course options).
 - i. Graduate students register for ILT courses through CAESAR.
 - ii. Postdoctoral researchers register for ILT courses through Learn@Northwestern.
 - c. Salary for trainees who have not completed the required training within the identified time boundary and before leaving Northwestern are unallowable and must be removed from the award and charged to a non-sponsored account. Salary cannot resume until training requirements are complete.
3. Learn@Northwestern will generate monthly reports for schools/units with NSF funding. Reports are sent to central school/unit administrators on the first of each month. These reports will include a comprehensive list of trainees supported by NSF awards, information about the funding department, and the RCR curricula they are required to complete.
 - a. Undergraduate students will have the *RCR curriculum for undergraduate students* assigned.
 - b. Graduate students and postdoctoral researchers will have two curricula assigned (with the exception of trainees in DGP, NUIN and IBIS who are not required to complete online training): *RCR curriculum for graduate students and postdoctoral researchers-ILT* and *RCR curriculum for graduate students and postdoctoral researchers-WBT*.

4. **Departments/schools/units review the reports to ensure completion status for all trainees.** The column indicating *Student Curriculum Status* will be marked as 'acquired' when the curriculum has successfully been completed.
 - a. Schools determine the frequency and method of communication with funding departments.
 - b. CITI training completions are loaded into Learn@Northwestern on a nightly basis and will not instantly appear as 'acquired' until the next day. ILT courses will not appear as 'acquired' until grades are entered at the end of each quarter.
 - c. If a trainee has successfully completed CITI RCR training but the curriculum is not appearing as acquired, the departments/schools/units should first ensure that the student is successfully using the single sign-on method (SSO) and logging-in with a Northwestern NetID and Password (see appendix B for instructions). Contact Beth Irwin in the Office for Research Integrity (ORI) if trouble linking the two accounts continues.
 - d. If a trainee has successfully completed an ILT RCR course but the curriculum is not appearing as acquired, email Beth Irwin in ORI and include the name of the course and date completed.

5. **Schools/units communicate RCR training compliance to ORI.**
 - a. If trainees are non-compliant, schools/units must email ORI with verification that salary has been removed from the award and charged to a non-sponsored account.
 - b. If a graduate student or postdoctoral researcher is near the curriculum due date and has been unable to complete the ILT course, schools/units can submit a formal request to ORI for an extension (see appendix c). In order for the extension to be granted, the trainee must successfully complete the next appropriate ILT course that is available.
 - c. ORI will conduct quarterly reviews of the RCR training compliance report. Any trainees identified as being non-compliant will be reported to the schools and the VP for Research.