
PROTOCOLS FOR PARTICIPATION IN RESPONSIBLE CONDUCT OF RESEARCH TRAINING

PROTOCOLS STATEMENT

Lipscomb University (“Lipscomb”) requires that all Senior/Key Personnel (including applicable faculty, students, postdoctoral fellows, and investigators/directors) participating in any externally funded research or sponsored program successfully complete RCR training as required by a Federal Awarding Agency and/or term or condition of an award. In addition, the ORG or IRB may direct any other individuals participating in any externally funded research or sponsor program to complete RCR training. While such training may be required for certain awards, Lipscomb encourages and welcomes all members of the Lipscomb research community to participate in any RCR training.

PURPOSE

The purpose of these protocols is to promote research ethics and integrity at Lipscomb through RCR training.

APPLICABILITY

These protocols are applicable to any Lipscomb employee or student participating in or administering an externally funded research or sponsored program awarded to Lipscomb.

DEFINITIONS

Capitalized terms that are used but not otherwise defined in these protocols have the following meanings:

CFR means the Code of Federal Regulations.

Collaborative Institutional Training Initiative, or CITI, is the virtual training provider currently utilized by Lipscomb to provide training in research, research conduct, and compliance.

DOD means the U.S. Department of Defense.

DOE means the U.S. Department of Energy.

FCOI means financial conflict of interest.

Federal Agency or *Agency*, as defined in 5 U.S.C. §551(1) and further clarified in 5 U.S.C. §552(f), generally means each authority of the Government of the United States, whether or not it is within or subject to review by another agency.

Federal Award, as defined in 2 CFR §200.1, has the following meaning, depending on the context:

(1)(i) The Federal financial assistance that Lipscomb receives directly from a Federal Awarding Agency or indirectly from a pass-through entity, as described in 2 CFR §200.101; or (ii) the cost-reimbursement contract under the Federal Acquisition Regulations that a non-Federal entity receives directly from a Federal Awarding Agency or indirectly from a pass-through entity, as described in 2 CFR §200.101.

(2) The instrument setting forth the terms and conditions. The instrument is the grant agreement, cooperative agreement, other agreement for assistance covered in paragraph (2) of the definition of Federal financial assistance in 2 CFR §200.1, or the cost-reimbursement contract awarded under the Federal Acquisition Regulations (48 CFR §52.204-17).

Federal Award does not include other contracts that a Federal Agency uses to buy goods or services from a contractor or a contract to operate Federal Government owned, contractor operated facilities. See also the definitions of Federal financial assistance, grant agreement, and cooperative agreement in 2 CFR §200.1.

Federal Awarding Agency, as defined in 2 CFR §200.1, means the Federal Agency that provides a Federal Award directly to a non-Federal entity.

Institutional RCR Coordinator means the individual appointed by Lipscomb to provide or coordinate compliant RCR and ethics training opportunities that support the research enterprise.

IRB means Lipscomb's Institutional Review Board.

NIH means the National Institutes of Health.

NSF means the National Science Foundation.

ORG means Lipscomb's Office of Research and Grants.

PD means Project Director(s) and includes any co-Project Director(s), which are commonly used for awards that are programmatic in nature or without a dedicated research component.

PI means Principal Investigator(s) and includes any co-Principal Investigator(s), which are commonly used in research grants.

Responsible Conduct of Research, or RCR, as used by the NIH, promotes the aims of scientific inquiry, fosters a research environment that enables scientists to work together toward common goals, and promotes public confidence in scientific knowledge and progress for the public good.

RST means research security training, which specifically addresses cybersecurity, internal collaboration, foreign interference, malign foreign talent recruitment programs, and conflicts of interest.

Senior/Key Personnel, or S/KP, includes PIs, PDs, evaluators, curriculum designers, and other individuals who bear the responsibility for the overall operation and performance of the externally funded research or sponsored program, including but not limited to, management, reporting, subrecipient monitoring, record retention, compliance, and effort certification. Senior/Key Personnel does not include those who have made, or will make, a contribution to the project which does not result in a measurable impact.

U.S.C means the United States Code.

USDA means the U.S. Department of Agriculture.

PROCEDURES

Lipscomb requires that all S/KP (including applicable faculty, students, postdoctoral fellows, and investigators) participating in any externally funded research or sponsored program successfully complete RCR training if the Federal Awarding Agency or other funding agency requires RCR training as a term or

condition of the award or if completion of RCR or other training is required by applicable federal regulations. In addition, the ORG or IRB may direct any other individuals, including any third-party Sub-awardee, contractor, or vendor participating in any Lipscomb externally funded research or sponsor program to complete RCR and/or other applicable training. Lipscomb encourages and welcomes all members of its research community to participate in RCR training.

COMPLIANCE

Federal Awarding Agencies have statutory requirements as to which individuals participating in externally funded research or sponsored programs need to complete RCR training. Lipscomb's compliance with this training requirement is tracked by the ORG and IRB. Federal Awarding Agencies requiring completion of virtual or face-to-face RCR training include, but are not limited to, the NIH, the NSF, and the U.S. Department of Agriculture's National Institute of Food and Agriculture). Compliance is also required for direct federal flow-through awards as well as subawards received by partnering institutions and organizations.

NON-COMPLIANCE

Non-compliance with RCR training requirements may result in any of a number of consequences, including, but not limited to, disallowance of salary and any associated expenses charged to the externally funded research or sponsored project, removal of the S/KP from the project, the appointment of replacement personnel, removal from research support roles for a sponsored project, loss of eligibility to apply for future grants, termination of assistantships, or referral for academic disciplinary action.

ASYNCHRONOUS (VIRTUAL) TRAINING

CITI Program Training

Lipscomb provides training courses through the CITI program available at www.citiprogram.org. On the CITI program website, click on "My Courses" and "Log In" if you already have an account, or "Register" an account in the system if you do not have an account. Select "Lipscomb University" as the Organization Affiliation. Enroll in the course entitled "Responsible Conduct of Research (RCR)." This web-based training course results in the issuance of a certificate of completion.

Research Security Training

Regulatory requirements and/or terms and conditions of awards from agencies including, but not limited to, the NSF, NIH, DOE, DOD, and USDA, may require the completion of RST. While on-campus or asynchronous training provided by Lipscomb may cover one or more of these topics, all S/KP (including PIs and PDs) are required to complete the NSF-developed synchronous training module, available through the SECURE Center Consolidated Training Module located at <https://www.secure-center.org/ctm>. This web-based training course results in the issuance of a certificate of completion. Completion of this web-based training is required for PIs, PDs, and other S/KP for research and programs awarded by NSF, NIH, DOE, DOD, and USDA, and other agencies as directed by ORG to comply with Section 10634 of the CHIPS and Science Act of 2022 (42 U.S.C. §19234).

Financial Conflict of Interest Training

In addition to completion of RCR training, regulatory requirements and/or terms and conditions of awards from NIH, PHS, and other healthcare funding agencies may also require the completion of FCOI training utilizing the NIH-developed FCOI module available on the NIH website at https://grants.nih.gov/grants/policy/coi/tutorial2018/story_html5.html. This web-based training course results in the issuance of a certificate of completion. This module is to be completed following the completion of Lipscomb Conflict of Interest training session to meet the statutory requirement for all investigators.

FACE-TO-FACE (INCLUDING SYNCHRONOUS) TRAINING

Lipscomb provides a minimum of eight hours of RCR training, which is made available annually to comply with NIH, DOD, and other regulatory requirements. Lipscomb's RCR training is provided on-site in a face-to-face format, which often includes guest speakers and topic experts, including those presenting synchronously.

Upon completion of RCR training, a paper and/or digital certificate of completion will be issued by ORG to provide tangible evidence that training requirements have been met. It is the responsibility of the individual receiving the certification to provide appropriate copies to the IRB and/or the PI, and generally retain such documentation for a minimum of three years after the funding agency's acceptance of the final financial report or pursuant to an alternative directive issued by ORG.

GENERAL FREQUENCY OF TRAINING

CITI RCR Training

CITI RCR training must be completed during the first year of appointment of the award. Lipscomb encourages all S/KP to complete training initially upon award notification (e.g., within the first two weeks). In general, all S/KP must complete training at least once every four years, and at least once during each professional career stage (e.g., student, postdoctoral researcher, assistant professor, associate professor, full professor), and in alignment with funding agency requirements.

Face-to-Face RCR Training

Face-to-face RCR training must be completed during the first year of appointment to the award, and must be completed prior to departing Lipscomb, if departure is sooner than the next career cycle. In general, training must be completed at least once every four years, and at least once during each professional career stage (e.g., student, postdoctoral researcher, assistant professor, associate professor, full professor), and in alignment with funding agency requirements.

Research Security Training

Lipscomb encourages all S/KP to complete initial RST promptly after receipt of an award (e.g., within the first two weeks). Completion of the RST is required within 12 months prior to proposal submission. Training must be completed at least annually by all S/KP during the award cycle.

FCOI Training

FCOI training is required prior to the expenditure of funds for any new NIH award. Lipscomb encourages all S/KP to complete FCOI training promptly upon receipt of an award. FCOI training must be completed every four years after the first training. Immediately upon notification by NIH or Lipscomb under certain circumstances. FCOI training must also be completed when there is any change in applicable policies or protocols, when a new investigator is appointed, and/or when any investigator or S/KP is identified as non-compliant with Lipscomb's conflict of interest protocols or management plan.

RESPONSIBILITIES

All S/KPs shall complete training requirements in accordance with funding agency requirements and the terms and conditions of their award(s). PIs or PDs, as applicable, shall notify all program S/KP of their requirement to complete training. S/KPs shall notify the applicable investigator upon completion of training and provide a copy of the completion certificate to the PI/PD. The PI/PD shall provide a copy of all completion certificates to ORG. All S/KPs shall retain evidence of training completion for a minimum of three years post-award or as otherwise directed by ORG. All S/KPs shall notify ORG in the event that a required training topic is not provided within the year to establish necessary on-demand training session(s).

Lipscomb's institutional RCR coordinator, who serves in the ORG, shall:

- Develop, deliver, and/or coordinate ORG-led, face-to-face, online/virtual, and hybrid trainings for the campus community in compliance with the applicable requirements of a Federal Awarding Agency;
- Take attendance and issue certificates of participation or certificates of completion to attendees;
- Retain appropriate documentation for all RCR training sessions in accordance with 2 CFR § 200.334, which may include copies of slideshows, attendance, surveys, guest speakers, handouts, presentation dates/times/durations, and other relevant information; and
- Provide appropriate documentation to applicable Federal Awarding Agencies upon request, reporting, and/or audit purposes.

The ORG shall:

- Ensure that S/KPs of awards requiring RCR and other training as a term or condition of the award are informed of the requirement and can communicate that requirement to appropriate senior personnel, faculty, staff, students, and others;
- Ensure that an annual RCR training calendar of in-person events is available to the campus community on Lipscomb's website;
- Complete federal or sponsoring agency certifications, approved by the authorized organizational representative, attesting that Lipscomb has or will provide an appropriate RCR training plan at the time of funding and will communicate all such requirements to the institutional RCR coordinator to ensure continuity of programming (if such an attestation is required at the time of submission or award acceptance);
- Provide RCR training plans to the Federal Awarding Agency (and auditors) upon request;
- Retain all certificates for at least three years after completion, in compliance with 2 CFR § 200.334;
- Provide training as required but not included within these protocols for the administration of awards utilizing clinical trials, vertebrate animals, recombinant or synthetic nucleic acids, hazardous materials or pathogens, lasers, drones (unmanned aerial vehicles), or incurring other risks; and
- Complete RCR, research security training, and FCOI training.

CONFLICT

These protocols are subject to applicable law. In the event of any conflict between the provisions of these protocols and applicable law, including, without limitation, Section 7009 of the America COMPETES Act, the provisions of applicable law shall control.

CONTACT

For additional information or questions regarding these protocols, contact the Office of Research and Grants, which can be reached at 615-966-5907 or researchandgrants@lipscomb.edu.

EFFECTIVE DATE

These protocols were approved by the Office of the Provost on February 16, 2026.