

Responsible Conduct of Research Training

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Scope

This policy applies to all faculty, staff, students, and other personnel who participate in federally sponsored research or scholarly activities at the University of Nebraska Omaha, including but not limited to Principal Investigators (PIs), Co-Investigators, senior/key personnel, and project staff.

Policy Statement

The University of Nebraska at Omaha (UNO) is committed to an environment of research integrity, in part through Responsible Conduct of Research (RCR) training and education. The Office of Research and Creative Activity (ORCA), with administrative support from the Office of Sponsored Programs and Research (OSP) and Research Compliance, oversees the delivery of RCR training at UNO.

The University of Nebraska Omaha (UNO) requires training in the Responsible Conduct of Research (RCR) and research security for individuals involved in federally sponsored research.

In accordance with the CHIPS and Science Act of 2022 (Section 10634) and National Security Presidential Memorandum-33 (NSPM-33), UNO requires that all covered personnel complete institutional training that addresses both RCR and research security requirements.

UNO utilizes an institutionally developed training program, "RCR for All," which satisfies:

- Federal Responsible Conduct of Research (RCR) training requirements; and
- Federal research security training requirements.

All covered individuals must:

- Complete required training prior to participation in federally sponsored research; and
- Maintain current training status in accordance with sponsor and institutional requirements.

The University will certify compliance with training requirements, as applicable, in proposal submissions and awards.

While training is required for all federally sponsored awards, there are specific requirements for NSF, NIH, NIFA awards:

NSF: NSF requires RCR training for all faculty, senior personnel and trainees (including students, graduate students, and postdoctoral researchers) who are involved as researchers in projects supported by NSF funds. For PIs and senior personnel, this training needs to be completed **prior** to work on the NSF funded research project, and as soon as possible once student researchers are selected or hired on the project, but not later than the end of the first semester of involvement in the NSF-funded project. PIs on NSF awards are responsible for ensuring that they and all other personnel, including students and trainees on their award complete RCR training, and provide documentation of the completion of training along with any other requirements of the award. Failure to complete the training may result in disciplinary action, including placing a stop order on the NSF funds until the training is complete.

NIH: NIH requires all NIH-funded trainees, fellows, participants and scholars to complete the training no less than once every four years. NIH recognizes that online RCR courses are valuable training supplements but does not consider them adequate as a sole means of instruction. This RCR regulation applies to certain National Institutes of Health awards. When applying for an award with an RCR training requirement, the request for proposals will specify that investigators are required to submit an individual plan for RCR training directly in the proposal. Each proposal needs to include a plan that meets the requirements specified in NIH regulations. This plan may include online training but please note that these courses alone are insufficient to meet some of the NIH project-specific requirements, which requires a face-to-face training component. **This Notice applies to the following programs: D43, D71, F05, F30, F31, F32, F33, F34, F37, F38, K01, K02, K05, K07, K08, K12, K18, K22, K23, K24, K25, K26, K30, K99/R00, KL1, KL2, R25, R36, T15, T32, T34, T35, T36, T37, T90/R90, TL1, TU2, and U2R.** This policy also applies to any other NIH-funded programs supporting research training, career development, or research education that require instruction in responsible conduct of research as stated in the relevant funding opportunity announcements.

NIFA: The U.S. Department of Agriculture-National Institute of Food and Agriculture requires RCR training. All program directors, faculty, undergraduate students, graduate students, postdoctoral researchers and any staff participating in research and research-related activities (i.e., research, education and extension) supported by a NIFA (competitive grant, capacity grant, cooperative agreement or special project) must participate in RCR training.

Reason for Policy

This policy ensures compliance with federal requirements governing research integrity and security, including:

- [CHIPS and Science Act of 2022, Section 10634](#) (Research Security Training)
- [NSPM-33](#) (National Security Presidential Memorandum on Research Security)

These regulations require institutions to implement research security programs and training to mitigate risks such as foreign interference, improper disclosure, and misuse of research funding.

This policy also supports UNO's commitment to ethical research practices, regulatory compliance, and protection of sensitive research and intuitional integrity.

Research projects funded by the [National Science Foundation](#) (NSF), [National Institutes of Health](#) (NIH), and [National Institute of Food and Agriculture](#) (NIFA) each have RCR training requirements.

Procedures

All covered individuals must complete the online [RCR for All](#) training prior to engaging in federally sponsored research.

The training program will include, at a minimum:

- Research integrity and ethical conduct
- Conflicts of interest and commitment
- Disclosure requirements
- Safe and secure international collaboration
- Research data protection and cybersecurity
- Foreign interference awareness
- Export control and regulatory compliance

Training must be refreshed **at least every four (4) years**, or more frequently if required by a sponsor or the University.

Where required by federal agencies, training must be completed **within 12 months prior to proposal submission**.

Forms

Anyone with University credentials can access the [training through this link](#) in the Bridge Learning Management System.

History

Policy approved by the Chancellor's Cabinet on 2/16/2010. Policy revised on 11/28/2012. Policy revised on 01/24/2024 to include revised NSF requirements and to provide additional guidance regarding NIH requirements. Policy revised on 4/16/2026 to incorporate federal research security training requirements under CHIPS Act and NSPM-33] and expanded applicability to all faculty and staff on federally sponsored projects.

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