# Research Training Policy

| | |
|---|---|
| Responsible Offices: | The Office of Research & Sponsored Projects (ORSP) and the Institutional Review Board (IRB) and Office of Research Oversight |
| Effective Date: | October 1, 2025 |

## Purpose

Seattle University (SU) is committed to responsible and ethical research, in compliance with all federal, state, local, sponsor, and university requirements. This policy establishes training requirements for all researchers engaged in projects supported by external sponsors, including but not limited to the National Science Foundation (NSF) and the National Institutes of Health (NIH). The purpose is to ensure compliance with federal regulations, foster a culture of ethical and responsible research, and safeguard the integrity, security, and public trust in the institution's research enterprise.

## Scope

This policy applies to:

- All faculty, staff, undergraduate students, graduate students, and postdoctoral scholars participating in research sponsored by the National Science Foundation, National Institutes of Health, and/or other federal agencies as specified in the requirements below.

## Roles and Responsibilities

- **Principal Investigators (PIs):** Ensure that all project personnel complete required training prior to engaging in research.

- **Researchers (paid or unpaid):** Complete assigned training in a timely manner and comply with federal and institutional policies.

- **Office of Research and Sponsored Projects:** Provide training resources, track completion, and verify compliance for RECR, RST, and FCOI training requirements.

- **Institutional Review Board:** Provide training resources to all SU faculty, staff, and students; review human subjects research submissions and track progress on protocols determined to be Expedited or Full Board; and verify compliance with human subjects training requirements on all active submissions.

**Policy Statement**

## 1.  Responsible and Ethical Conduct of Research (RECR)

**Requirement:** In 2007, Congress passed the America COMPETES (Creating Opportunities to Meaningfully Promote Excellence in  Technology, Education, and Science) Act, which required that "each institution that applies for financial assistance from the National Science Foundation (NSF) 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."

NIH mandates that trainees on an NIH institutional research training grant, individual fellowship, career development award (institutional or individual), research education grant, dissertation research grant, or other grant programs that have a significant training component have a minimum of eight hours of formal instruction at least once during each career stage and at least every four years.

**Format:** SU utilizes the Collaborative Institutional Training Initiative (CITI) online modules (https://about.citiprogram.org/) to satisfy the RECR training requirements. ORSP oversees compliance with this training for all researchers on grants requiring this training.

**Frequency:** Training must be completed upon joining an NSF or NIH-funded project and must be completed every four years thereafter.

## 2. Research Security Training (RST)

**Requirement:** The NSF, NIH, DOE, and DOD require that proposers, covered individuals, and senior/key personnel complete research security training (RST). This is in accordance with National Security Presidential Memorandum 33 (NSPM-33) and Section 10634 of the CHIPS and Science Act of 2022. This training addresses cybersecurity, international collaboration, foreign interference, and rules for proper use of funds, disclosure, conflict of commitment, and conflict of interest, which meets the government-wide RST requirement.

**Format:** SU utilizes the SECURE Center's Consolidated Training Module to satisfy this requirement. The module is available through SU's learning management system (LMS) on EngageSU. Individuals required to complete the training per each agency will receive a notice from the LMS indicating the training has been added to your learner profile. ORSP oversees compliance with this training.

Per NSF's Important Notice No. 149, "NSF, NIH, DOE, and DOD all recognize completion of the condensed course as compliant with their respective RST requirements."

**Frequency:**

- **NSF Requirement:** The National Science Foundation (NSF) requires research security training certifications from proposers and individuals identified as senior/key personnel by the proposer within 12 months prior to proposal submission.

- **NIH Requirement:** The National Institutes of Health (NIH) requires that each individual identified as a senior/key person must certify that they have completed the requisite research security training that meets the research security training requirements within 12 months prior to application submission. Individuals serving as senior/key personnel must continue to certify annually that they have completed training within the past 12 months.

### 3. Human Subjects

**Requirement:** In compliance with federal regulations (45 CFR 46, 21 CFR Parts 50 and 56) and institutional policies, SU requires that all researchers conducting research involving human subjects where that research has been determined to be above an Exempt-level of risk need to complete training in human subject protections. SU recommends that all researchers conducting research involving human subjects complete training in human subjects protections.

**Format:** SU utilizes the Collaborative Institutional Training Initiative (CITI) online modules (https://about.citiprogram.org/) to satisfy the human subjects training requirements. The IRB and Office of Research Oversight oversees compliance with this training as part of the review process of all IRB submissions.

**Frequency:** Certification through the SU CITI training modules must be completed by all SU research personnel prior to IRB approval and renewed every three years. Certification through a different institution will be accepted for Co-PIs and other research personnel who are not affiliated with SU but are named on IRB applications submitted by an SU PI or Co-PI.

### 4. Financial Conflict of Interest (FCOI)

**Requirement:** In alignment with SU's Financial Conflict of Interest policy investigators must disclose any significant financial interests to the institution. Per 42 CFR 50.604 of Subpart F – Promoting Objectivity in Research, researchers funded by the Public Health Service (PHS) are required to complete Financial Conflict of Interest training.

**Format**: SU utilizes the Collaborative Institutional Training Initiative (CITI) online modules (https://about.citiprogram.org/) to satisfy the FCOI training requirements. ORSP oversees compliance with this training.

**Frequency:** Initial training prior to engaging in PHS-sponsored research and at least every four years thereafter, or immediately if:

(1) The Institution revises its financial conflict of interest policies or procedures in any manner that affects the requirements of Investigators;

(2) An Investigator is new to an Institution; or

(3) An Institution finds that an Investigator is not in compliance with the Institution's financial conflict of interest policy or management plan.