October 13, 2009

TO: Deans, Chairs, and Directors

FROM: Kim A. Wilcox, Provost
      J. Ian Gray, Vice President for Research and Graduate Studies

RE: Responsible Conduct of Research, Scholarship, and Creative Activities

As you may know, Congress approved the “America Creating Opportunities to Meaningfully Promote Excellence in Technology, Education, and Science (COMPETES) Act” (P.L. 110–69) with strong bipartisan support in August 2007. Section 7009 directs the National Science Foundation to require all grantees to provide “appropriate training and oversight in the responsible and ethical conduct of research” to all students (undergrad and grad) and postdoctoral researchers participating in NSF-supported research projects. NSF has implemented this requirement by mandating that all proposals submitted to NSF after January 4, 2010, include a certification that the applicant has an institutional “plan to provide appropriate training and oversight in the responsible and ethical conduct of research to undergraduates, graduate students, and postdoctoral researchers who will be supported by NSF to conduct research.” While the plan does not have to be submitted with MSU’s proposals to NSF, NSF may review the plan of any institution which makes such a certification.

Responsibility for academic content generally resides with the faculty of each academic unit, subject to review and approval through established academic governance procedures. We know and expect that all MSU units already address aspects of responsible and ethical conduct of research and scholarly/creative activities in their existing curricula. All respected undergraduate and graduate programs do. The quality of our research and scholarly activities depends on it.

While units which seek and receive NSF funding are now responsible for ensuring and documenting that the necessary training and education will be done for students and postdoctoral researchers supported by NSF grants, we ask and expect that all MSU academic units participate in the activities related to implementation of the NSF requirements. We believe that teaching students and trainees about responsible practices in research, scholarship, and creative activities is also of vital importance to the reputations and quality of units which do no NSF-sponsored research.

Responsibility for planning and decisions concerning the nature, content, and extent of training will be delegated to departments, graduate programs, and other academic
units and programs responsible for managing NSF projects, with the joint assistance and oversight of the Office of the Provost and the Office of the Vice President for Research and Graduate Studies. The Graduate School will help to consolidate and disseminate resources and model programs that the faculty can use and build upon. The Graduate School’s Responsible Conduct of Research Workshop Series will continue to be offered as a resource, but it is not intended as a surrogate for training and education that appropriately occurs within academic programs and units.

The Graduate School, with the support of the Research Integrity Council, will soon be distributing an “inventory survey” requesting that departments and programs describe how they now provide education and training in the responsible conduct of research, scholarship, and creative activities. In addition, the inventory will ask respondents how they plan to augment and enhance current education/training in the responsible conduct of research.

Information provided through the inventory surveys will be summarized and shared for all to review to help units consider and develop individualized plans that will collectively comprise MSU’s institutional plan. Please remember that the MSU plan for compliance with the NSF requirement must be documented for possible future review by NSF. NSF has assured institutions through public meetings that implementation of plans will be audited.

We ask units and programs whose faculty submit NSF grants to complete the inventory by November 2, 2009. Draft program/unit plans for current and planned formal education and training in the responsible conduct of research must be submitted to and approved by the appropriate collegiate dean’s office by December 7, 2009. This will permit time for discussion with the Graduate School, if necessary, prior to a final deadline of December 27, 2009.

Units that do not foresee endorsing the submission of proposals to the NSF should complete the inventory by November 8, 2009. We also encourage these units to plan for delivery of comparable training appropriate to their disciplines. These plans should be submitted to the Graduate School after review and approval by the appropriate collegiate dean’s office. The deadline for their submission is May 15, 2010.

Attached, for your information, is a draft of the MSU policy being developed in connection with the new NSF requirement. Please note again that certification that MSU’s plan is in place will be required on NSF proposals submitted by MSU after January 4, 2010.

We want to stress that we believe adherence to academic norms, professional standards, and legal requirements for the responsible conduct of research, as well as to the principles on which those norms, standards, and requirements are based, should be an expectation and not just a goal. Thank you for your time and deliberations in this process.