Guide to Research at USC Spring 2010



The following is a reference tool that highlights some of the important USC policies related to sponsored projects. Please refer to this guide both in the proposal preparation stage and throughout the course of your research.

Contact the Office of Research Advancement (<u>www.usc.edu/research</u>, or 213-740-6709), for any general questions on research within USC, and contact the Office of Compliance (http://ooc.usc.edu/ or 213-740-8258) for any general questions on research compliance.

TABLE OF CONTENTS

I.	Proposal Submission	
A.	Who May Be an Investigator	4
B.	Institutionally Limited External Competitions	4
C.	Regulatory Research Committees	5
D.	Conflicts of Interest and Commitment	
E.	Institutional Conflicts of Interest	
F.	Export Controls	
G.	Cost Sharing	
Н.	Graduate Student Tuition Remission	
I.	Reimbursement Rates	
J.	NSF Responsible Conduct of Research (RCR)	
K.	American Recovery and Reinvestment Act (ARRA)	
II.	Account Establishment	
A.	Pre-Award Costs/Advanced funding	
В.	Account Creation	
C.	Division of Overhead for Multi-School Projects	
III.	After Research Commences	
A.	SCera	
В.	Effort Reporting	
C.	Cost transfers	
D.	Subrecipient monitoring	
E.	Program Income	
F.	Use of Consultants	
G.	Expenses and Purchases	
H.	Interdepartmental Consulting	
I.	Recharge Centers and Specialized Service Facilities	
J.	When to Notify Regulatory Research Committees	
K.	When to Update Conflict of Interest Disclosure	
L.	Material Transfer Agreements	
M.	Non-Disclosure Agreements	
N.	NIH Public Access Policy	
О.	Audits	
IV.	Closeout	
A.	Reporting	
В.	Intellectual Property	
V.	Scientific Integrity	15
A.	Data Management	15
B.	Authorship	15
VI.	Education Requirements	16
A.	WEBBA training	
B.	Grants Management Education	16
C.	Responsible Conduct of Research (RCR)	16

D.	Human Subjects Education	16
E.	Animal Use	16
F.	Radiation Safety	16
G.	Institutional Biosafety	17
H.	Research Advancement	17
I.	GCP	17
J.	Research Administrator's Forum (RAF)	17
	PARiS	

I. Proposal Submission

All externally sponsored proposals must be submitted through the **Department of Contracts and Grants.** To facilitate this process, USC has implemented the **Pre Award Research Information System ("PARiS")**, a web-based system that streamlines how proposals are developed, approved, and submitted to sponsors. PARiS is intended to replace the Proposal Approval Record ("PAR"), and eliminates the need for paper routing and approval of the various components of a proposal. It also eliminates the need to download Pure Edge or Adobe forms as part of the submission of a proposal into grants.gov, and provides a budget calculator that pulls data directly from USC Payroll Services. Paper routing of proposals via use of a PAR remains available until the transition to PARiS is complete. Proposals may be submitted for industry-sponsored clinical trials involving human subjects through **Health Research Association (HRA)** (http://www.health-research.org/).

For further information on PARiS, including how to obtain an account and training on how to use the system, visit the Department of Contracts and Grants website at http://dcg.usc.edu, or call (213) 740-7762 (University Park Campus), or (323) 442-2396 (Health Sciences Campus).

A. Who May Be an Investigator

All tenured, tenure track, and non-tenure track faculty, and research scientists (with the exception of lecturers, adjunct, and part-time clinical faculty) may act as Principal Investigators. Postdoctoral Research Associates and Postdoctoral Teaching Associates, as defined by USC's Postdoctoral Scholars Policy, may act as co-principal investigators on sponsored projects, but may not be principal investigators unless a specific waiver and approval is granted upon recommendation by the Department and approval of the appropriate Dean. To review the Postdoctoral Scholars Policy, please visit http://policies.usc.edu/policies/postdoctoral011003.pdf.

B. Institutionally Limited External Competitions

Some grant competitions sponsored by outside agencies restrict the number of applicants a university can nominate. In such cases, potential applicants must go through an internal review process and receive approval from USC administration prior to submission to the sponsoring agency. Deadlines for USC internal reviews are typically a month or more in advance of the sponsoring agency's own deadlines.

Researchers intending to apply for an institutionally limited competition should contact the Office of the Vice Provost for Research Advancement at (213) 740-6709 as soon as an announcement is released.

Further information on institutionally limited competitions can be found at: http://www.usc.edu/research/for-researchers/funding/competitions/.

C. Regulatory Research Committees

If your proposal is subject to review by a regulatory research committee, committee approval is required before research can commence and before an account is established. Investigators should contact the applicable committees before, or soon after, a proposal is submitted, to avoid delays in starting research. The Department of Contracts and Grants and Health Research Association (HRA), as applicable, are authorized to restrict access to account funds until all necessary approvals are obtained. The USC regulatory research committees are as follows:

- Human Subjects: Institutional Research Board (IRB). The IRB oversees research involving a living individual about whom an investigator conducting research obtains: (1) data through intervention or interaction, or (2) identifiable private information. Visit http://www.usc.edu/admin/provost/oprs/, or call (323) 223-2340 (Health Science Campus); (213) 821-5272 (University Park Campus).
- Stem Cells (Adult or Embryonic): **Embryonic Stem Cell Research Oversight Committee** (**SCRO**). The SCRO provides oversight of all issues related to the derivation and use of stem cells, including but not limited to Human Embryonic Stem Cell (hESC) research. Call (323) 442-1607, or email Elizabeth Forman at eforman@usc.edu.
- Animals: Institutional Animal Care and Use Committee (IACUC). The IACUC oversees
 procedures related to research and testing of animals. Visit www.usc.edu/hsc/dar/iacuc/forms/, or
 call (323) 442-1689.
- Biological Agents and Regulated Carcinogens: Institutional Biosafety Committee (IBC). The
 IBC is responsible for oversight of the use of all potentially hazardous biological agents,
 including infectious agents, human and non-human primate materials, known regulated
 carcinogens, recombinant DNA and studies involving human gene transfer. Visit
 http://capsnet.usc.edu/LabSafety/BioSafety,call (323) 442-2200, or e-mail ibc@caps.usc.edu.
- Radioactive Materials: Radiation Safety Committee (RSC). The RSC is responsible for
 ensuring that radioactive materials and radiation-producing devices are used safely and in
 accordance with State and Federal regulations. Visit http://capsnet.usc.edu/LabSafety/RAD, or
 call (323) 442-2200.
- Select Agents (as identified at www.cdc.gov/od/sap/docs/salist.pdf): Institutional Biosafety Committee (IBC). Approval must be obtained from the IBC prior to receiving or using any Select Agent in isolated form above exempt quantities. Visit http://capsnet.usc.edu/LabSafety/BioSafety/SelectAgentProgram/index.cfm, (323) 442-2200, or e-mail ibc@caps.usc.edu.

D. Conflicts of Interest and Commitment

Any potential conflict of interest related to your research must first be identified in PARiS when submitting a proposal for external support, and also in the iStar system when submitting a protocol for review by the IRB. You must also fully disclose the potential conflict by completing a Statement of Outside Interests Related to Research and submitting it to the Office of Compliance. Research cannot commence until a decision is made by the **Conflict of Interest Review Committee (CIRC)**, which may

require that you follow a conflict management plan. Conflicts that arise during the course of research must also be disclosed when they first appear, and also require an approved management plan. Conflicts of commitment must be disclosed through your supervisor and Dean. Call the Office of Compliance at (213) 740-8258 for further information. Resources follow.

http://policies.usc.edu/policies/conflictresearch070108.pdf http://ooc.usc.edu/ResearchCompliance/ConflictsOfInterest/ConflictOfInterest.cfm http://policies.usc.edu/policies/conflictadmin110102.pdf (Conflict of Commitment)

E. Institutional Conflicts of Interest

USC's Institutional Conflict of Interest (ICOI) policy addresses instances where the financial interests of the University have the potential to cause bias in the conduct of research. Such conflicts occur most frequently in situations where a research project provides a direct benefit to an outside entity through evaluation, validation, trial or test of an invention, product, drug, service, or technology, and the University holds a financial interest in the outside entity. An institutional conflict is considered "significant" if a research project involves human subjects and the university: (1) holds any private equity in the outside entity; (2) has the potential to receive cash payments from existing licensing arrangements with the outside entity; or (3) maintains an ownership interest or an entitlement to equity in a publicly-traded sponsor of human subjects research as a result of technology licensing activities.

Institutional conflicts that are not significant are managed through disclosure of the University's relationship with the outside entity in all publications, proposals, consent documents, and presentations. Significant conflicts are presumed to be unacceptable unless compelling circumstances are present that justify allowing the research to proceed at the University despite the presence of the conflict.

Please review the policy at http://policies.usc.edu/policies/InstitutionalConflict090109.pdf for more detail.

F. Export Controls

The U.S. Government maintains two primary sets of export control regulations that may impact university research. The Export Administration Regulations ("EAR") regulate exports of commercial items with potential military applications (so called "dual-use" items). The International Traffic in Arms Regulations ("ITAR") regulate exports of items and services specifically designed for military applications.

In addition to these export control regulations, university activities also may be subject to the U.S. Government's economic sanctions against certain countries, entities and individuals. These economic sanctions programs are administered by the Treasury Department's Office of Foreign Asset Controls ("OFAC").

USC does not restrict participation in research to United States citizens, nor does it accept restrictions on a researcher's ability to share the results of his or her research freely. If you become aware that a sponsor is seeking to restrict participation or publication (other than short review periods to ensure that no confidential or proprietary information has been inadvertently disclosed in an intended publication), please contact the Office of Compliance at (213) 740-8258. You may also review more detailed information regarding Export Control regulations on the Office of Compliance website at http://ooc.usc.edu/ResearchCompliance/ExportControls/expControls.cfm.

G. Cost Sharing

Cost sharing occurs whenever any portion of project costs are provided at USC's expense rather than at the expense of the sponsor. Mandatory cost sharing is required by the sponsor as a condition of the award, while voluntary cost sharing is not.

There are two kinds of voluntary cost sharing. Voluntary **committed** cost sharing is either committed at the time a proposal is submitted, or develops during the conduct of the supported activity. Voluntary **uncommitted** cost sharing is not proposed or budgeted for in a sponsored agreement. It generally occurs when research personnel donate additional time above that proposed to the sponsor or agreed to as part of the award.

If a cost sharing <u>commitment</u> arises before the submission of a proposal, regardless of whether it is mandatory or voluntarily committed, the commitment must be identified and approved in writing or via the PARiS approval system by the Dean of the relevant school(s) or unit(s) prior to submission of a proposal to the Department of Contracts and Grants. If the committed cost sharing arises during the conduct of the supported activity, the Principal Investigator must notify his or her Dean and obtain written approval as well. After the appropriate approval is obtained, the portion of compensation that is cost-shared should be charged to an appropriate school, unit or departmental cost sharing account. Call the Office of Financial Analysis at (213) 821-1937 for further guidance.

Although not classified as cost-share, any salary overage beyond the NIH salary cap must also be charged to an unrestricted school, unit or departmental account.

H. Graduate Student Tuition Remission

Graduate students participating in research projects may receive a reasonable amount of support (tuition remission and other support) on the basis of the student's participation in a sponsored project. Tuition remission is considered an allowable direct charge for most sponsors, provided that: (1) the student is conducting activities necessary to the sponsored agreement; (2) tuition remission is consistently provided in a like manner to students in return for similar activities conducted in non-sponsored as well as sponsored activities; and (3) during the academic period, the student is enrolled in an advanced degree program at USC and the activities of the student in relation to the sponsored project are also related to the degree program in which the student is enrolled.

The NIH has established a funding cap that limits the amount it awards for a combination of graduate student salary and tuition remission. This cap is determined through reference to the National Research Service Award (NRSA) stipend in effect at the time the grant award is issued. The cap in effect at the time the proposal is submitted applies to the entire life of the competitive segment of the project. Current NRSA levels are posted at http://grants.nih.gov/training/nrsa.htm.

Tuition charges should be assigned to research grants and other funding sources in proportion to the graduate student's salary allocation during the nine-month academic year.

I. Reimbursement Rates

Information on reimbursement rates for indirect costs and fringe benefits may be obtained at the Department of Contracts and Grants website (http://dcg.usc.edu/PropPrep/Rates.cfm). Current graduate assistant stipend rates may be found in Appendix "F" of the Graduate School's Graduate Assistant

Handbook. Current graduate student tuition remission rates may be found at Appendix "G" of the Graduate Assistant Handbook. Please visit

http://www.usc.edu/schools/GraduateSchool/documents/StuServices/GA Handbook.pdf for more detail.

USC has also established minimum salaries for Graduate Assistants and Postdoctoral Scholars, which are available at:

http://www.usc.edu/research/private/Min_Sal_for_Grad_Rsrch_Assts.pdf

J. NSF Responsible Conduct of Research (RCR)

Effective January 4, 2010, NSF will require USC to certify at the time of proposal submission that it has a 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 the NSF to conduct research. USC is also responsible for tracking and verifying that the training requirement has been satisfied. USC faculty applying for NSF support do **not** need to develop their own, separate plan to meet this requirement when proposing to the NSF. Details on USC's RCR program can be found at: http://www.usc.edu/research/about/policies/responsible_conduct_of_research_rcr/index.html

K. American Recovery and Reinvestment Act (ARRA)

Recipients of ARRA awards are subject to numerous accounting and reporting requirements. These include quarterly reports that provide precise status updates on progress and estimates on the number of jobs created and/or retained. The quarterly reports must be made within ten (10) days after the end of each quarter and will be made available to the public via www.Recovery.gov.

The Department of Contracts and Grants tracks ARRA awards, coordinates reporting and provides guidance to investigators on how to comply with the reporting requirements. If you have received ARRA funding, please visit http://dcg.usc.edu/ for further information. You may also call the Department of Contracts and Grants at (213) 740-7762 (UPC) or (323) 442-2396 (HSC) for guidance.

II. Account Establishment

The **Department of Contracts and Grants** negotiates the terms of all sponsored research agreements with external sponsors, with the exception of industry-sponsored human clinical trials. Such trials are negotiated by **Health Research Association (HRA)** unless a federal sponsor is providing the funds to industry to conduct the trial.

A. Pre-Award Costs/Advanced funding

Pre-award costs and advanced funding enable investigators to incur costs on a sponsored project before the university has actually received award funds.

Pre-award costs are used for costs incurred up to 90 days *before* the official start date of an award, but only where there is a programmatic justification to do so.

Advanced funding is used to incur costs *after* the official start date of the award, but prior to the university actually receiving the award funds.

Both pre-award costs and advanced funding require authorization from the investigator's dean (school of primary appointment), because the Dean's account is at risk until the award is received. For further information, visit the Department of Contracts and Grants website at http://dcg.usc.edu/, or call (213) 740-7762 (University Park Campus), or (323) 442-2396 (Health Sciences Campus).

B. Account Creation

The Department of Contracts and Grants first prepares a Notice of Award (NOA), which contains a summary of the terms and conditions of the award, and sends it to the Principal Investigator. It is important to review this document and maintain a copy in your files. The Department of Contracts and Grants then establishes an account related to the sponsored project. Until the account is established, the PI cannot charge costs against the award. For further information, visit the Department of Contracts and Grants website at http://dcg.usc.edu/, or call (213) 740-7762 (University Park Campus), or (323) 442-2396 (Health Sciences Campus).

C. <u>Division of Overhead for Multi-School Projects</u>

In instances involving collaboration between researchers in more than one school, the master account should be established in the school of the Principal Investigator's primary appointment. Satellite accounts should be established in the school of the co-investigator(s) primary appointment so that indirect costs may be allocated in proportion to the research costs accrued in that school. For further information on how to establish a satellite account, visit the Department of Contracts and Grants website at http://dcg.usc.edu/, or call (213) 740-7762 (University Park Campus), or (323) 442-2396 (Health Sciences Campus).

III. After Research Commences

A. SCera

SCera is USC's portal to electronic research administration services and information. It is designed to assist researchers and research administration staff with various aspects of managing sponsored projects, including easy to read account balances and effort certification. The portal also acts as a gateway to information provided by the Office of Compliance, the Office of the Vice Provost for Research Advancement, and the Department of Contracts and Grants, as well as other departments. In order to access SCera and obtain a user account, please visit http://aisportal.usc.edu/fis/portal/. For new users, there is a two-page quick start guide that can be accessed from SCera's homepage or by going to: https://aisportal.usc.edu/fispa/help/SCera_guide.pdf. If you have further questions, you may send an e-mail to scera@usc.edu.

B. Effort Reporting

Faculty and research staff are responsible for reporting and certifying percentage effort charged to a sponsored project in a timely manner. Certification includes making corrections and adjustments if there are differences between estimates and actual effort. All twelve-month faculty and exempt employees must certify their effort quarterly, while all nine-month faculty and RA's must certify their effort once each semester. Non-exempt staff effort is certified bi-weekly via the university's time keeping systems. The Principal Investigator is responsible for confirming that the faculty and staff members working on the sponsored project have certified promptly and that the time and effort charged appear reasonable.

To assist in the completion of effort reporting, USC has implemented a web-based effort certification system called eCert, through which all effort may be certified. eCert is accessed through SCera, USC's Electronic Research Administration Portal, which may be found at http://aisportal.usc.edu/fis/portal/.

Certification processes are overseen by USC's **Office of Financial Analysis**. Visit http://fbs.usc.edu/depts/ofa/, call (213) 821-1937 or contact your own department coordinator for further guidance. Specific guidance on effort reporting can be found at: http://www.usc.edu/research/private/Effort_Reporting_Guidance_12_09_09.pdf

C. Cost transfers

A cost transfer is a mechanism used to transfer payroll and non-payroll transactions from one sponsored account to another when a sponsored account was erroneously charged. Cost transfers must be made within 90 days of when the error is discovered, and no later than 15 days after the termination date of the budget period. All cost transfers must be fully documented. USC's **Sponsored Projects Accounting** (**SPA**) oversees the cost transfer process. Visit http://fbs.usc.edu/depts/spa/, or call (213) 740-5381 for more information.

D. <u>Subrecipient monitoring</u>

All subcontractors must sign a subcontract that includes a detailed statement of work. Investigators should monitor subcontractors to ensure that they are complying with the terms of the award. These monitoring duties include confirming that the subcontractor is satisfying the statement of work, and that the invoices submitted by the subcontractor are reasonable, allocable, and allowable on the project. For assistance on

issues related to subrecipient monitoring, please contact the Department of Contracts and Grants (http://dcg.usc.edu/) or the Office of Financial Analysis (http://fbs.usc.edu/depts/ofa/).

E. <u>Program Income</u>

Program income is gross income earned by a grantee that is directly generated by the project or activity or earned as a result of the award, other than income resulting from royalties or licensing fees. All program income must be reported on the financial status report.

F. Use of Consultants

Before an independent contractor (e.g. consultant) provides professional advice or service that will be paid for by a sponsored project account, Attachment "A" of USC's standard Independent Contractor Agreement must be signed by the Department of Contracts and Grants to confirm allowability. Attachment "A" and other independent contractor information can be accessed at www.usc.edu/dc/ic.

Furthermore, for sponsored-project funded independent contractor projects, Business Services (Purchasing Services and Disbursement Control) is required to perform a cost analysis on each independent contractor's proposed pricing to confirm reasonableness. If costs proposed by the independent contractor are significantly higher than the cost analysis, the independent contractor cannot be engaged until further review.

University faculty are not eligible to receive compensation for consulting within the university.

G. Expenses and Purchases

All expenses and purchases funded by a sponsored project account must directly and fully benefit the project. Furthermore, all expenses and purchases funded by a sponsored project must comply with the sponsor's guidelines. For example, international travel funded by a sponsored project must be comply with the Fly America Act.

H. Interdepartmental Consulting

Faculty time should be budgeted for inter-school projects in the same manner that faculty time is budgeted for single school projects. There should be no distinction between the way a faculty member is compensated for a project that involves a single school from a project that involves multiple schools. In particular, interdisciplinary research, even in the form of interdepartmental consulting on a sponsored project, is not an overload activity and is considered part of a faculty member's regular workload and compensation. Please contact the Office of Financial Analysis (http://fbs.usc.edu/depts/ofa/; (213) 821-1937) for additional guidance.

I. Recharge Centers and Specialized Service Facilities

USC schools, academic departments and other university divisions may establish Recharge Centers and Specialized Service Facilities to provide goods and/or services to university activities, programs and organizations. In some instances, they are established to provide specialized services to a few users, such as animal care facilities, but they may also be used to provide commonly used goods or services, such as telecommunications centers or computer centers. A Specialized Service Facility usually provides services involving the use of complex or highly-specialized services.

Regardless of which type of facility is established, billing rates must be designed to recover no more than the allowable cost of goods and services provided. In addition, all users, including those supported by federal awards, must be billed at the same rate for similar goods and services.

The Office of Financial Analysis (http://fbs.usc.edu/depts/ofa/; (213) 821-1937) provides guidance and oversight to assist in the establishment of such facilities and costing assistance to ensure that services provided are charged in an appropriate manner.

J. When to Notify Regulatory Research Committees

Investigators must inform regulatory research committees of any changes that relate to studies under their jurisdiction, such as:

- Adverse events
- Changes to study personnel
- Protocol changes
- Changes in funding sources

If you are unclear as to whether to report a change, consult the applicable committee.

K. When to Update Conflict of Interest Disclosure

Any change in a financial or other interest related to research must be disclosed to the CIRC, regardless of whether a disclosure was made at the outset of the research. These include changes in the:

- Percentage of ownership in outside entities with a financial interest in research;
- Amount of consulting performed on behalf of an outside entity;
- Role of an investigator in an outside entity (i.e., from consultant to managerial role).

L. <u>Material Transfer Agreements</u>

A Material Transfer Agreement (MTA) is a research contract between a provider and a recipient of research materials which governs the terms and conditions under which the research material may be used. MTA's protect the intellectual and other property rights of the provider, and may also address issues such as publication, limitation(s) on the use of the research materials, inventions and results from the use of the research material, indemnification, and liability issues.

USC Stevens is responsible for reviewing MTAs to ensure compliance with these requirements, and acting as the authorized university representative for purposes of signing the MTA. Please visit USC Stevens at http://stevens.usc.edu/have_mta.php for further guidance.

M. Non-Disclosure Agreements

Non-disclosure agreements are permitted in limited circumstances as a necessary step toward initiating funded research projects or licensing technology. USC Stevens is responsible for reviewing NDAs (http://stevens.usc.edu/have_mta.php).

N. NIH Public Access Policy

The NIH Public Access Policy mandates that journal articles that arise from NIH funding be submitted to PubMed Central for open access upon acceptance by the journal. Also, all NIH applications, proposals, and progress reports must include the PubMed Central reference number when citing an article that is authored or co-authored by the investigator, or arose from the investigator's NIH award. It is important to comply with this requirement to ensure that your research can continue to be funded by NIH.

For further information on how to comply with this requirement, please visit the Office of Compliance website at http://ooc.usc.edu/ResearchCompliance/NIHPubAccPol.cfm, or the Norris Medical Library website at http://www.usc.edu/hsc/nml/lib-information/nih.html.

O. Audits

If you receive oral and/or written notice from a sponsor or other outside agency that it intends to conduct an audit or any other type of review of your sponsored project, please immediately contact the Office of Financial Analysis at (213) 821-1937, or the Office of Compliance at (213) 740-8258.

IV. Closeout

A. Reporting

Investigators are required to satisfy all final reporting requirements, which include notifying the sponsor that the research has been completed, submitting final reports, and disclosing project results and expenditures. **USC's Sponsored Projects Accounting (SPA)** office is charged with fiscal oversight of the project closeout process. Visit http://fbs.usc.edu/depts/spa/, or call (213) 740-5381 for more information.

B. <u>Intellectual Property</u>

Under USC's Intellectual Property policy (http://policies.usc.edu/policies/intellectualproperty040301.pdf) and consistent with both federal and state laws, all intellectual property (e.g., patentable inventions) resulting from government and industry sponsored projects, or from substantial use of university resources, must be disclosed to **USC Stevens**. USC Stevens assists faculty, staff and students with intellectual property matters in several ways, including obtaining and maintaining patents, identifying potential licensees and partners, consulting on start-up activities and strategies, and negotiating related agreements. In addition, USC Stevens provides services for transferring technologies to other non-commercial and non-profit research institutes. Visit http://stevens.usc.edu/, or call (213) 821-5000 for more information.

V. Scientific Integrity

The Office of Compliance offers an on-line course as part of its Grants Management Education program that emphasizes research integrity issues, such as conflict of interest, scientific misconduct, peer review, data management and mentoring. You may access the course at http://ooc.usc.edu/ResearchCompliance/GrantsMangEdProgram/Registration.cfm.

Investigators are expected to conduct research with the highest ethical standards. Allegations of plagiarism, fabrication, and falsification are taken seriously. USC's policy on scientific misconduct (http://policies.usc.edu/policies/scientificmisconduct070108.pdf) defines the university process for investigations into such allegations.

A. <u>Data Management</u>

Data can include laboratory notebooks, notes, preliminary analyses, as well as any other records that are necessary for the reconstruction and evaluation of results of research, regardless of the form or media on which they are recorded. Generally speaking, USC owns all research data created in the course of research conducted at the university.

B. Authorship

Generally speaking, authorship credit should be given to those who have made significant contributions to the conception and design, or analysis and interpretation of data, or both; to drafting of the manuscript or revising it critically for intellectual content; or on final approval of the manuscript. Principal authorship and other publication credits should accurately reflect the relative scientific or professional contributions of the individuals involved, regardless of their relative status.

VI. Education Requirements

A. WEBBA training

All staff members must complete mandatory WEBBA System Training, which provides an introduction to the Budget Administration (WEBBA) System, within 30 calendar days of receiving their BA system access, or their access will be frozen until they complete the training. For further details, go to: www.usc.edu/dept/finserv/dirtrng/handsontraining.html.

B. Grants Management Education

All principal investigators, co-investigators and research administrators <u>must</u> complete <u>one</u> of the two courses in Grants Management Education program to obtain access to sponsored projects funds or the budget administration system. To register, go to http://ooc.usc.edu/ResearchCompliance/GrantsMangEdProgram/index.cfm.

C. Responsible Conduct of Research (RCR)

USC's RCR course for undergraduates, graduate students, and post-docs is provided by CITI (Collaborative IRB Training Initiative). For more information on how to access the course, contact the Office of Compliance at (213) 740-8258 or complian@usc.edu. Completion of the CITI RCR course satisfies the NSF's RCR training requirement. Details on USC's RCR program can be found at: http://www.usc.edu/research/about/policies/responsible_conduct_of_research_rcr/index.html.

D. Human Subjects Education

All key personnel engaged in human subjects research must complete the CITI on-line human subjects education course. Go to: www.usc.edu/admin/provost/oprs/citi, or contact the **Office for Protection of Research Subjects** at (213) 821-1154, or oprs@usc.edu.

E. Animal Use

All Principal Investigators, staff, and students working in laboratory animal facilities and/or handling animals or animal tissues must complete initial training and yearly refresher training thereafter, by the **Department of Animal Resources**. Visit www.usc.edu/hsc/dar/, or call (323) 442-1689.

F. Radiation Safety

All individuals who work with or in the vicinity of radioactive material or radiation-producing machines must undergo appropriate training. This training is required by the **Radiation Safety Committee** and administered by **Environmental Health and Safety**. Visit http://capsnet.usc.edu/LabSafety/RAD, or call (323) 442-2200.

G. <u>Institutional Biosafety</u>

All investigators and laboratory personnel who engage in research involving potentially hazardous biological agents, including but not limited to infectious agents, human and non human primate materials (including established cell lines), known regulated carcinogens, select agents, recombinant DNA and studies involving human gene transfer must undergo appropriate training. This training is required by the **Institutional Biosafety Committee** and administered by **Environmental Health and Safety**. Visit http://capsnet.usc.edu/LabSafety/biosafety, or call (323) 442-2200.

H. Research Advancement

The Office of Research Advancement offers courses in grantsmanship, including specialized courses on proposal writing for foundations, corporations, NIH, and Department of Defense. Information can be found at: http://www.usc.edu/research/for_researchers/training/, or call 213-740-6709.

I. GCP

The Office for Protection of Research Subjects (OPRS) administers training in how to adhere with Good Clinical Practice (GCP) standards, which are the international, ethical, and scientific standards expected in design, conduct, performance, monitoring, auditing, recording, analysis, and reporting of clinical trials. Compliance with GCP provides regulators assurance that data are reported, results are credible and accurate, and that the rights, safety, confidentiality, and well-being of trial subjects are protected. Beginning January 1, 2010, GCP training is required for all USC PIs and Key Personnel conducting Full Board clinical trial research. For more information, please visit http://www.usc.edu/admin/provost/oprs/training/gcp.html.

J. Research Administrator's Forum (RAF)

The RAF, which meets approximately three times per year and is sponsored by the Office of Compliance, provides research administrators from both campuses an opportunity to network and share information related to research administration and compliance, discuss issues and learn about university policies and procedures as well as changes in laws and regulations that may apply to them. The RAF was established in response to a recommendation from faculty and staff members to give administrators more opportunities to share experiences with peers and learn about the research administration issues that affect their job responsibilities.

Anyone interested is encouraged to attend. Please call the Office of Compliance at (213)740-8258 to be added to the invitation list.

K. PARiS

USC's Pre Award Research Information System ("PARiS") replaces the Proposal Approval Record ("PAR"), and eliminates the need for paper routing and approval of the various components of a proposal. The Department of Contracts and Grants offers periodic training on how to use the PARiS system. Please visit the Department of Contracts and Grants website at https://paris-scera.usc.edu/help/paris-informational-sheet.pdf for further detail.