



Research Integrity & Compliance Review Office
Office of Vice President for Research
321 General Services Building
2011 Campus Delivery
Fort Collins, Colorado 80523-2011
TEL: (970) 491-1553
FAX: (970) 491-2293
<http://ricro.research.colostate.edu>

Suzanne Plimpton
Reports Clearance Officer
National Science Foundation
4201 Wilson Blvd., Rm. 295
Arlington, VA 22030
Email to splimpto@nsf.gov

Re: Public Comment regarding NSF Notice [Federal Register Volume 77, Number 179] - Review of Awardee Implementation of NSF's Requirement for a Responsible Conduct of Research Program

November 13, 2012

To Whom It May Concern;

Colorado State University has a strong tradition of incorporating responsible conduct of research training into its curricula, and is in full compliance with Section 7009 of the America Competes Act. Participant, curricula and evaluation information regarding face-to-face and online components of RCR education at CSU is available from the date of implementation in Fall 2010 to the present.

CSU provides the following comments for consideration:

1. Rather than interviewing representatives of each program, as proposed, we believe it would be far more instructive and effective to solicit from institutions a copy of their institutional RCR training policy and implementation strategies, assess these, and provide constructive feedback on the strengths and weaknesses of the plan. This approach is more scientific, more quantitative, and provides benefit to both institutions and NSF OIG. This process is analogous to HHS ORI review of research misconduct policies. This process could be supplemented by NSF-initiated electronic questionnaires/surveys, with results being made public to participating institutions.
2. If interviews are to take place, the list of interviewees provided in the Notice seems incomplete, for example, by excluding faculty. CSU would like to emphasize the importance of faculty member experiences in the information collection process, in addition to the upper-level administrators, program participants and program administrators. It is our view that faculty members have a primary responsibility for instilling RCR training and education. An RCR program

does not supersede the responsibility of faculty member; rather, faculty mentoring should be an integrated part of an RCR program.

3. We believe that the burden on institutions has been underestimated. At CSU, we have already spent greater than 4 hours in reading, assessing, and preparing a response to the present notice. Any systematic auditing of academic programs will necessitate additional time and effort for self-assessment, to understand what is being asked, whether our program, in fact, would be judged to have gaps, and how we would fill such gaps. We estimate that these efforts would take many hours and the participation by at least 12 CSU faculty, students and staff.

Thank you for your consideration of our comments to this important Notice.

Sincerely,

A handwritten signature in blue ink that reads "Kathryn M. Partin". The signature is written in a cursive style with a small flourish at the end.

Kathryn M. Partin
Director, Research Integrity & Compliance Review Office