Instructions for Requesting a Waiver of Requirement for Full Time Research Compliance Officer (RCO)

VHA Directive 1058.01 §5.g(8) requires that each Director of a VA medical facility with a research program appoint at least one full-time RCO unless a waiver for a part-time RCO is approved by the Office of Research Oversight (ORO)(10RO) and the Office of Research and Development (14RD). To obtain a waiver, the facility Director must submit a request to the RCO Waiver Review Committee (WRC) for review. If the WRC recommends that the waiver request be approved, it will be forwarded to the Executive Director of ORO and the Chief Research and Development Officer (CRADO) for review and approval or disapproval.

Please submit waiver requests to OROEDA@VA.GOV.

Please include the following information in the waiver request:

1. Description of Facility Research Program
   a. Total number of investigators conducting each of the following types of research: human, animal and safety research.

2. Justification for RCO Waiver Request
   a. Rationale - provide sufficient details to justify waiver.
   b. Proposed percent time to be devoted to RCO duties - ORO recommends no less than 12.5%.
   c. Proposed percent time to be devoted to other duties.
   d. Potential conflicts of interest or responsibilities (and proposed management actions to mitigate, if applicable). **NOTE:** The RCO may **not** report to, or have duties directed by, the Associate Chief of Staff for Research or members of the Research Service.
   e. Supervisory arrangements.
   f. A description of the facility’s training and mentoring strategy for the RCO.

3. Copy of Position Description or Functional Statement (must include RCO duties and all other duties to be performed).

4. Copy of Curriculum Vitae (if RCO has been selected).

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