1. **Purpose**

The University must ensure that individuals serving in the capacity of Principal Investigator have appropriate technical competence and administrative capabilities, and have a reasonable prospect of long-term commitment to the University.

These regulations:

1.1 define the requirements that must be met by those who serve in the capacity of principal investigator on externally sponsored programs at the University; and

1.2 ensure that sponsored projects are conducted by those who have the requisite training, skill, commitment, availability, and resources as well as appropriate relationship to the University.

2. **Scope**

2.1 These regulations apply to all proposals submitted to sponsoring agencies seeking monetary or non-monetary support of a sponsored project, which if awarded to the University will be governed by a contract, grant, cooperative agreement or other binding agreement.

2.2 These regulations do not apply to consultant agreements or the procurement of goods or services from vendors.

3. **Regulation Statement**
As a condition of its acceptance of sponsored project awards from sponsoring agencies, the University is obligated in its role as the recipient of the award to ensure that:

3.1 only individuals meeting the eligibility requirements of these guidelines are listed as a principal investigator, co-principal investigator, project director, program director on sponsored project proposals/applications;

3.2 all proposals are reviewed, approved and submitted by an authorized individual acting on behalf of the University; and

3.3 all proposals submitted meet the requirements of the sponsoring agency. If the sponsor’s requirements are less restrictive than the University’s policy, the University’s policy shall take precedence.

4. Definitions

4.1 **Cooperative Agreement** – An agreement where the sponsor has substantial involvement in the project and the work is conducted by both the sponsor’s employees and the principle investigator.

4.2 **Contract** – An agreement with specific obligations for both the sponsor and the recipient where the sponsor is seeking to procure a product or service, has more involvement, and uses the project to achieve a specific outcome or deliverable. In general, contracts contain a more precisely stated expectation than grants of a definable work product or service on some set schedule as a condition of payment and can be terminated for convenience.

4.3 **Grant** – A pledge of support where the sponsor has little involvement in conducting the project and generally is given to the University with a purpose to support instruction, research or public service.

4.4 **Co-Principal Investigator** – A University employee with an eligible appointment who is responsible for a portion of the design, scientific, technical, or administrative conduct or reporting of a research, training, or service project supported by extramural funding sources.

4.5 **Sponsor or Sponsoring Agency** – The organization that funds a project via a contract, grant or cooperative agreement, or other award agreement.

4.6 **Sponsored Project or Sponsored Program** – An activity that is supported by funding from a governmental agency, corporation, or private foundation to carry out a specific purpose and that is governed by specific terms and conditions.

4.7 **Sponsored Project Award** – Funding from an external entity such as a governmental agency, corporation, or private foundation for an activity with a defined scope and purpose undertaken by the University with the expectation of an outcome or something of value that directly benefits the sponsor.

4.8 **Principal Investigator** (also project administrator, project director, program administrator, or program director) - The employee or student of the University who has been designated by the University and approved by a sponsoring agency to direct a project funded by an external sponsor.

4.9 A principal investigator must personally participate in the project to a significant degree. A principal investigator is directly responsible and accountable to the University and the sponsoring agency for the proper programmatic, scientific, or technical conduct of the project, and its financial and day-to-day management, and reporting.

4.10 The principal investigator is a critical member of the sponsored project team responsible for ensuring compliance with the financial and administrative aspects of the award. The principal
investigator works closely with appropriate administrators within the University to create and maintain necessary documentation, including both technical and administrative reports; prepares budget justifications; appropriately acknowledges external support of research findings in publications, announcements, news programs, and other media; and ensures compliance with other Federal and organizational requirements. It is expected that the Principal investigator will maintain contact with the appropriate sponsor representative with respect to the scientific aspects of the project and the business and administrative aspects of the award.

4.11 Approved principal investigators serve at-will and may be removed at any time from this role at the recommendation of their dean or administrative department head, area Vice Chancellor and/or the Dean of Research and Sponsored Programs and/or decision of the Chancellor.

4.12 A principal investigator is a steward of Federal funds and is subject to Federal, State, and local criminal and civil laws and regulations.

5. Eligibility Requirements

5.1 Eligibility Requirements for Faculty as Principal investigator

In order for a faculty member to be a principal investigator, the individual must:

5.1.1 be a full-time employee of the University;

5.1.2 hold a fixed term faculty rank with title designations “lecturer,” “artist-in- residence,” “writer-in-residence,” and any faculty rank of instructor, professor, associate professor, assistant professor with the pre-fix qualifier “clinical,” research,” or “visiting,” or director of a formally-approved institute or center at the University; and

5.1.3 have the requisite training, skill, commitment, availability, and expertise.

5.2 Eligibility Requirements for Administrator/Staff as Principal investigator

In order for a staff member to be a principal investigator, the individual must:

5.2.1 be a full-time employee of the University;

5.2.2 have the requisite training, skill, commitment, availability, and expertise;

5.2.3 seek approval from the Dean of Research and Sponsored Programs through appropriate departmental channels.

5.3 Eligibility Requirements for Students

A student cannot, in general, be appointed principal investigator on a sponsored project.

5.4 Exceptions to Eligibility Requirements

5.4.1 Exceptions to the Principal Investigator Eligibility Requirements

Exceptions to the aforementioned eligibility requirements require the approval of the Dean of Research and Sponsored Programs. Exceptions may be made but are not limited to the following personnel: associate research scientist/scholar, post- doctoral fellows, lecturers, instructors, emeritus faculty, and other non full-time appointments.

5.4.2 Conflicts with Sponsoring Agencies

In some cases, a sponsoring agency may have more stringent restrictions on the qualifications for the principal investigator on a particular project than are mandated by University guidelines. In these
situations, the sponsor’s restrictions will prevail over the policies, procedures or guidelines of the University for that particular sponsored project. In the situation where a sponsor may require or expect an individual to serve as a principal investigator but that individual is ineligible to be appointed under these guidelines, then the individual must seek the approval of the Dean of Research and Sponsored Programs through appropriate departmental channels for a co-principal investigator. Once an appointment for a co-principal investigator has been approved by the Dean of Research and Sponsored Programs, that appointee shall serve as co-principal investigator for internal purposes and shall assume responsibility for compliance with sponsor and institutional requirements. Fellowships or other training awards are examples where sponsor and institutional requirements may conflict.

5.4.3 Student–Initiated Projects

Certain sponsored programs have as their purpose the support of graduate education or research through student-initiated projects (i.e., fellowships, etc.). For these sponsored programs, the following conditions apply:

5.4.3.1. A full-time faculty member or equivalent, as identified in these guidelines, must serve as Faculty Advisor.

5.4.3.2. The Faculty Advisor shall retain the responsibilities of a principal investigator under these guidelines.

5.4.3.3. The student shall be responsible for the intellectual conduct of the project with the oversight of the Faculty Advisor.

5.5. The sponsored project proposal to the sponsoring agency shall name the student as “Key Personnel” as long as the Faculty Advisor is named as the responsible individual. The proposal should acknowledge the student’s authorship of the proposal, as appropriate. Sponsor required reports shall acknowledge the student’s authorship of the report, as appropriate.

6. Roles and Responsibilities of the Principal Investigator

Principal Investigators are stewards of sponsored project award performance and funds. In that capacity, Principal Investigators are responsible for the overall proposal preparation and administrative, technical, and fiscal management of sponsored projects. These obligations include, but are not limited to the management of the sponsored project within funding limitations, adherence to reporting requirements and ensuring that the sponsoring agency is notified regarding a change in project status or significant conditions that may affect the sponsored project. The Dean of Research and Sponsored Programs shall outline through its various policies, procedures and guidelines specific responsibility requirements of Principal Investigators, which shall be enforced by the Division.

6.1 Manage the day-to-day operation of sponsored project financial transactions by authorizing direct charges to the sponsored project award;

6.2 Manage the property acquired with sponsored project funds to ensure proper labeling, inventoring, disposition, and reporting;

6.3 Ensure that proposed budget items and award expenditures are allowable, reasonable, allocable, and consistently treated as imposed by 2 C.F.R. part 220, the Federal Cost Accounting Standards (CAS) Board, and sponsoring agency guidelines;

6.4 Conform sponsored award terms and conditions, including limitations and exclusions;
6.5 Implement and adhere to compliance and internal control requirements provided for in OMB Circular A-133;

6.6 Review and comply with University and sponsor policies regarding ethical conduct in research including but not limited to the humane use of animals, protection of human subjects, procurement and use of chemicals and radioactive materials, export controls, conflicts of interest including but not limited to financial disclosures, and intellectual property;

6.7 Comply with reporting requirements and additional requests related to sponsor notifications and prior approvals;

6.8 Maintain and retain records and documentation to support sponsored project activities, including but not limited to performance data, financial transactions; and personnel effort; and

6.9 Oversee the proper close out of sponsored projects, including the submission of all required final reports.

6.10.1 Principal Investigators are not authorized to:

6.10.2 Accept or indicate acceptance of a sponsored project award verbally or in writing;

6.10.2 Enter into legal agreements including but not limited to grants, cooperative agreements, contracts, subawards, subcontracts, memoranda of understanding, material transfer agreements.

6.10.3 Reallocate sponsored funds budgeted for both undergraduate and graduate students for other purposes, including but not limited to, employ of senior, clerical or technical personnel.

6.11 Sponsored project award and legal agreements Dean of Research and Sponsored Programs or designee.

7. Mandatory Training Required

7.1 New Faculty/Principal Investigators shall attend a mandatory PI training course on managing sponsored projects during the University orientation or their initial appointment. Upon receipt of a sponsored project award, the Principal Investigator must meet with the Office of Sponsored Programs to participate in a “start-work” meeting to include representatives from Human Resources, and Purchasing within fifteen (15) business days of receipt of the award. At the “start-work” meeting the Principal Investigator will be provided project specific information that will enable an expeditious and earnest beginning of their research project including update of conflict of interest disclosure.

7.2 Principal Investigators, who conduct sponsored research and members of their laboratory, must complete Responsible Conduct of Research (RCR), laboratory safety, and conflict of interest and/or commitment training within one (1) year of appointment and participate in annual refresher courses.

8. Relationships between Principal Investigator, University and Sponsoring Agency

8.1 Sponsored Project Awarded to the University

Sponsored project awards are awarded to the University. In the event a Principal Investigator is no longer able or approved to serve as the Principal Investigator of an approved sponsored project prior to the completion of the sponsored project, the future of that sponsored project shall be governed by the terms and conditions of the sponsored project agreement (i.e., notice of grant award (NGA), notice of contract award (NCA), etc.), the wishes of the sponsor, and the University as deemed appropriate. In appropriate situations, the area Vice Chancellor, with the approval of the Dean of
Research and Sponsored Programs, must identify a substitute, eligible principal investigator who must agree to assume responsibility for the awarded sponsored program, and who, at a minimum, would bring the sponsored project to a close with the assistance of the Office of Sponsored Research and Programs and other university departments as appropriate.

8.2 Relationship of Principal Investigator to University

The Principal Investigator’s relationship to the University is governed by the University’s personnel policies and procedures. The approval of individuals as Principal Investigator in no way affects the rights, claims and duties of such individual as may be specified in University policies and procedures. In particular, responsibilities as Principal Investigator do not imply any commitment on the part of the University to any subsequent appointment.

9. Proposal Approval Requirements

All proposals/applications for sponsored projects must indicate the approval of the appropriate department chair, dean, area vice chancellor, the Provost (as appropriate) or Chancellor (as appropriate), indicating assurance to provide the resources (including space) necessary to carry out the sponsored project for the length of the specific project. The proposal and required internal assurances must be submitted, in advance of the submission deadline, to the Office of Sponsored Research and Programs, in accordance with established pre-award submission procedures.

10. Non-Compliance

Failure to comply with these guidelines may result in missed submission deadlines. Fabrication, falsification or plagiarism in a funding proposal or failure to comply with applicable research protocols is considered to be research/scientific misconduct. In those instances, the principal investigator is subject to disciplinary action as outlined in the University’s Misconduct in Research Policy. Disciplinary and/or corrective action may include one or more of the following: Termination of PI from the sponsored project; termination of the PI from the University; suspension or termination of research; referral for misconduct proceedings; suspension of access to sponsored project funds; return of funds to the sponsoring agency; and reporting to state and federal regulatory and/or sponsoring agencies.

11. Removal of a Principal Investigator

11.1 Approved principal investigators serve at-will and may be removed at any time from this role at the recommendation of their dean or administrative department head, area Vice Chancellor and/or the Dean of Research and Sponsored Programs and/or decision of the Chancellor.

11.2 All requests for removal of a Principal Investigator must be approved, in advance of the effective date of the removal, by the Dean of Research and Sponsored Programs. Removal shall be “for cause.” “For cause” occurs when a principal investigator fails to properly execute his or her duties with respect to the sponsored project or program.

11.3 Prior to removal, the principal investigator shall be given written notice of the intent to take such action. That notice shall include an explanation of the basis for the proposed action. The principal investigator shall be given at least five (5) working days from receipt of notice of the proposed action to respond and reach a satisfactory written resolution with the dean or administrative department head. If the principal investigator fails to reach a satisfactory resolution with the dean or administrative department head, the principal investigator may request, within five working days, that his or her proposed removal be reviewed by the area Vice Chancellor.

11.4 The area Vice Chancellor shall investigate the matter and, within thirty (30) calendar days
provide his or her recommendation to the Dean of Research and Sponsored Programs. The Dean of Research and Sponsored Programs shall provide his or her recommendation to the Chancellor within thirty (30) calendar days after receiving the request for a review. The Chancellor shall render a final decision on the removal of the principal investigator within five (5) working days after receiving the recommendation from the Dean of Research and Sponsored Programs. The Chancellor’s decision shall not be appealable.