University Policy: Principal Investigator Eligibility

Policy Category: Research

Subject: Principal Investigator Eligibility on Sponsored Research Projects

Office Responsible for Review of this Policy: Vice Provost for Research

Procedures: As described below

Related University Policies: Cost Share Policy

I.   SCOPE

American University supports and encourages its faculty members and full-time staff in their ambitions to pursue external funding to support their research, scholarship, creative and professional activities. The entrepreneurial activities of university faculty and staff in the pursuit of external funds are critical to the research and scholarly missions of the university. This document establishes the policy that defines the conditions under which members of the faculty and full-time staff of American University are appointed to principal investigator (PI) or co-principal investigator (Co-PI) status on proposals for sponsored research projects.

II.   DEFINITIONS

Career Development Award: One of a many types of awards for faculty members to assist in their establishment and further development as investigators, basic or clinical, in their field of expertise. Common examples include awards from the Faculty Early Career Development (CAREER) Program of the National Science Foundation (NSF) and Career Development (K) Awards from the National Institutes of Health (NIH).

Co-Principal Investigator/Co-Investigator: Key personnel who have responsibilities similar to that of a PI on research projects, but who play a less prominent leadership role in the overall project, and may report to, or be supervised by, the PI. The PI is ultimately responsible for the conduct of a research project, including ensuring that the project is conducted in compliance with applicable laws and regulations and institutional policies governing the conduct of sponsored research. One significant role of a Co-PI or a Co-I is to assist the PI in the preparation, conduct, and administration of an award for a sponsored research project.

Principal Investigator: The primary individual responsible for the preparation, conduct, and administration of a research grant, cooperative agreement, training or public service project, contract, or other sponsored project in compliance with applicable laws and regulations and institutional policies governing the conduct of sponsored research.

Sponsored Research Project: A sponsored research project is an activity that is externally funded and which includes a formal funding instrument such as a grant, contract, or a cooperative agreement between the university and the sponsor. A sponsored project involves a transaction that includes a specified statement of work and a related, reciprocal transfer of something of value.

III.   POLICY STATEMENT

Eligibility to act as a principal investigator (PI) or a co-principal investigator (Co-PI) on a sponsored research project is a privilege that is extended to both faculty members (term, tenure-earning and tenured) and full-time staff members of American University. Appointment to PI or Co-PI status of any member of the university faculty or full-time staff, or another individual who is not a member of the university's faculty or staff, requires specific approvals in the proposal routing and approval process by: (a) the teaching unit chair and the dean of the academic unit to which the individual reports; (b) the University Librarian; (c) the director of a center or institute; or (d) the administrative head of the administrative unit to which the individual reports. In specific cases, the approval of the Vice Provost of Research or Provost is required, as described below.

To ensure that accurate data exist to meet current university requirements for time and effort (T&E) reporting and the tracking of faculty annual assignments, each PI or Co-PI on a sponsored research proposal must have an explicitly stated level of effort, of a minimum of one percent (1%) to establish responsibility for project leadership. The level of effort stated in the sponsored project application should be consistent with the actual effort that each individual is expected to expend on the project during each relevant project period. An exception to the 1% minimum level of effort is made in circumstances where the proposal responds to a particular RFP, solicitation, or other grant guidelines, and said RFP, solicitation, or other grant guidelines mandate that a senior academic or administrative leader (such as the Provost, the Vice Provost for Research, a dean, etc.) must be the PI. This requirement is generally found in grant and research programs with large dollar awards, or where the proposal guidelines call for unique, institution-wide projects.

A person appointed to PI status on a sponsored project must accept all of the responsibilities associated with the application for, and the administration of, the awarded sponsored project. Each PI certifies on every proposal submission that all information in the proposal routing form and the application/proposal is true, complete and correct. In order to be appointed as a PI on a sponsored project, a researcher must confirm that he or she accepts ultimate responsibility in that role for the scientific conduct of the proposed project, the ethical performance of the proposed project, the protection of the rights and welfare of human or animal subjects, and adherence to any stipulations imposed by the applicable IRB and/or IACUC. In addition, the researcher must confirm that he or she accepts responsibility for compliance with all applicable regulations, laws, and policies of the sponsor and American University, including those governing the use of space, salary verification, cost sharing and the financial oversight of the proposed project.

A. Approvals of Appointments by the Chair of a Teaching Unit and the Dean of an Academic Unit, the University Librarian, the Director of a Center or Institute or the Administrative Head of an Administrative Unit

Appointments to PI status for researchers who are not members of the university faculty or full-time staff are approved on a case-by-case basis, as applicable, by: (a) the teaching unit chair and the dean of the academic unit to which the proposed PI reports; (b) the University Librarian; (c) the director of a center or institute, or (d) the administrative head of the administrative unit to which the proposed PI reports. In cases where the director of a center or institute reports to a dean, both the director and the dean approve the appointment of the PI or Co-PI. In cases where proposals are generated from areas outside an academic unit dean's jurisdiction, the Vice Provost for Research or the Provost will be responsible for the review and approval of such requests, in addition to the administrative head of the administrative unit. The review of a proposal for a sponsored research project must consider the academic quality of the proposal, the qualifications of the proposed PI, and the relevance and strategic importance of the proposal to other activities of the University. Approved PI or co-PI appointments are in effect for a particular project for a specified project period. Documentation of the approvals of the chair of the teaching unit and the dean of the academic unit, the University Librarian, a director of a center or institute or the head of another administrative unit must accompany proposals submitted to the Office of Sponsored Programs (OSP).

Plausible scenarios for appointments to PI status for researchers who are not members of the university faculty or full-time staff include:

1. Management of conferences, exhibits, workshops or public events of short duration

2. Projects which are part of large research programs, under the following conditions:

   a. The proposed project is a demonstrably important for the success of the larger research program.
   b. There is no member of the university faculty or staff associated with the larger research project who is qualified to take responsibility for the scientific direction of the proposed research project.
   c. For each graduate student participating on the project, a qualified faculty member has been identified to assure that the student's research and associated education are consistent with the degree for which the student is a candidate.

3. Career development awards, when the proposed PI on the project is mentored by an established faculty investigator who is named in the proposal.

4. Pending appointments for new faculty, when the appointment has been approved by the Provost and the project period start date is not prior to the start date of the faculty appointment.

B. Approvals for appointments granted by the Vice Provost for Research or the Provost

Approvals for PI or Co-PI appointment status may be made at the discretion of the Vice Provost for Research or the Provost in rare, non-recurring situations that meet a particular strategic objective for the university. Requests will be considered for specific projects with specific project performance periods. Examples include: proposals submitted by visiting faculty members and situations where a faculty investigator ceases to be available and it is necessary for the proposed PI to oversee an orderly completion and phase out of a project, subject to the approval of the sponsor.

Requests for PI or Co-PI appointments in such unusual circumstances should be made by a university faculty member on behalf of the proposed PI. These requests are subject to the approval of the appropriate (a) teaching unit chair and dean of the academic unit to which the proposed PI reports; (b) the University Librarian; (c) the director of a center or institute; or (d) the administrative head of the administrative unit to which the proposed PI reports; and (e) the Vice Provost for Research or the Provost.

In all cases, the following five criteria must be met:

1. The proposed research must meet a programmatic need of the university, that is, it facilitates the ongoing strategic objectives of the University in an identifiable and direct way.
2. The proposed research cannot be funded and/or conducted effectively unless the proposed individual is the PI or Co-PI.
3. The proposed PI's or Co-PI's qualifications to direct the project provides assurance that the work will be conducted in accordance with university policies and procedures.
4. For each graduate student participating on the project, a qualified faculty member has been identified to assure that the student's research and associated education are consistent with the degree for which the student is a candidate.
5. The proposed project is designed and conducted in such a way that work can be discontinued when the stated programmatic need ends or if the sponsoring faculty member ceases to be available.

A written copy of all such requests for PI or Co-PI appointments, the justification and approvals of the: (a) the chair of the teaching unit and the dean of the academic unit; (b) the University Librarian; (c) the director of a center or institute; or (d) the head administrator of the administrative unit; and (e) the Vice Provost for Research or the Provost must accompany the sponsored project proposal submitted to the Office of Sponsored Programs (OSP) for institutional approval.

VII.   EFFECTIVE DATE: <u>October 1, 2015</u>

VIII. SIGNATURE, TITLE, AND DATE OF APPROVAL

Approved:

_____   9/11/15_____

Scott A. Bass, Provost   **Date Approved**