

Academic Affairs
Approved By: Richard R. Rush

President

Policy Number: AA.11.001 **Effective Date:** 4/10/07

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Policy on Principal Investigator

PURPOSE:

To determine the minimum qualifications and normal responsibilities of Principal Investigators for Sponsored Programs beyond those imposed by the Sponsor. These qualifications include, but are not limited to, employment by the University or Auxiliary.

BACKGROUND:

New Policy

POLICY:

Accountability:

Provost/Vice President for Academic Affairs, Office of Research and Sponsored Programs

Applicability:

All eligible CSUCI faculty and staff as identified below

Definition(s):

For the purposes of this policy, "Principal Investigator" is defined as the individual designated in a grant or contract to be responsible for ensuring compliance with the academic, scientific, technical, financial and administrative aspects and for day-to-day management of the Sponsored Program (grant or contract) including programmatic reporting. Depending on the nature of the grant/ contract and the funding agency, the Principal Investigator may carry a different title in the contract or grant. Depending on the nature of the grant/ contract and the funding agency, the Principal Investigator may carry a different title in the contract or grant. While the day-to-day management of a project may be delegated to an individual other than the Principal Investigator, the Principal Investigator is still responsible for oversight of the project and ensuring that the grant work is conducted consistent with the funded proposal.

Text:

Principal Investigator Eligibility:

Tenured and probationary faculty, lecturer faculty with the approval of the Provost, and university administrators (MPP) are authorized to participate as principal investigators (PI) of externally-funded research and sponsored programs. Other individuals must be approved by the Provost in accordance with the established criteria for the appointment of an individual to Principal Investigator status. All PIs must be willing to work with the Office of Research and Sponsored Programs, Finance and



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Administration, and CI Foundation (if appropriate) to ensure adherence to CSUCI, CSU, and sponsors' policies, procedures and regulations.

<u>Criteria for the Appointment of an Individual to Provisional Principal Investigator Status:</u>

In most cases PI status is determined on the basis of employment. A PI must be an employee of CSUCI or the CI Foundation with exception of the following cases:

- 1) Emeritus faculty,
- 2) Individuals within CSUCI's volunteer status (Non-employee) who meet very specific qualifications and funder criteria.

Eligibility for Continuance of Provisional Principal Investigator Status:

Emeritus faculty and non-employees granted provisional PI status will undergo a formal review for continuation as a PI. The review date and report format will be specified in the terms of PI appointment. Continuation will be dependent on demonstrated competence in meeting program objectives, managing external funding, and adherence to CSUCI, CSU, and sponsors' policies, procedures and regulations. The review will be conducted by the Provost (or appropriate division Vice President) in consultation with the Office of Research and Sponsored Programs.

<u>Principal Investigator/ Project Director Roles and Responsibilities:</u> The Principal Investigator (PI) is responsible for the development of proposals in compliance with CSU, CSUCI and funding agency policies, procedures and requirements. The PI has the dual responsibility for complying with the financial and administrative policies of the award while achieving the goals and objectives of the project.

PI's operate under the supervision of the Program Chair and Dean or other administrative unit supervisor. It is the PI's duty to continuously exercise responsible judgment in the administration of the project and effectively train and supervise project staff. Although PI's may have administrative staff to assist in the management of sponsored projects, the ultimate responsibility for the successful completion of the scope of work and the management of funds rests with PIs.

In addition to completing the scope of work as prescribed in the funded proposal, PIs must:

1. Meet with Finance and Administration and ORSP (or CI Foundation if appropriate) annually to review sponsored project status.



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- 2. Initiate, execute and manage expenditures on award funds.
- 3. Ensure that expenditures on award funds are allowable and do not exceed the approved budget.
- 4. Submit required progress/technical reports to the funding agency on or before the report due date.
- 5. Provide a copy of progress/technical reports and correspondence (such as budget modifications, changes in key personnel including PI, major changes to the scope of work or project deliverables, progress/technical report deadline extensions) with the funding agency to ORSP (or CI Foundation if appropriate).
- 6. Comply with applicable sponsor rules and regulations during the day-to-day operation of the project and when making any changes to the scope of work or funded budget.
- 7. Comply with university and CSU policies, procedures and regulations.

Transfer or Replacement of PI:

Finance and Administration and ORSP (or CI Foundation if appropriate) are jointly responsible for assessing and negotiating all transfers of sponsored projects to another institution, and/or the transfer of equipment purchased with sponsor funds to another institution. A representative from Finance and Administration and the designated Sponsored Program Administrator are the only authorized university officials to directly negotiate with the sponsor.

Satisfactory progress on individual grants and contracts is determined by the funding agency on a project-by-project basis. Any issues and/or concerns with the performance of a PI regarding adherence to university policies and procedures will be initially addressed with the PI by Research and Sponsored Programs Administration and/or Human Resources depending on the issue. If the PI is non-responsive or if the response does not result in corrective action and future adherence to university policies and procedures, the situation will then be referred to the respective Program Chair and/or the Provost (or appropriate division Vice President) as necessary for assistance and resolution.

The PI is responsible for the timely submission of written notification to the Provost (or appropriate division Vice President) and the Office of Research and Sponsored Programs when requesting a change of PI status voluntarily on a sponsored project. Voluntary transfer or replacement occurs when a PI intends to leave the institution willfully, retires, or is unable to continue performing work on a sponsored project.



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Involuntary transfer or replacement of a PI occurs when the PI refuses to continue performing work on a sponsored project, is not in good standing with a funder or the university, or is not eligible to serve as the PI due to a change in employment status with the university.

When the replacement of a PI is involuntary it is the responsibility of the Provost (or appropriate division Vice President) for the timely submission of written notification to the PI, for the Office of Research and Sponsored Programs, Dean, and Program Chair stating why the PI is not in good standing with a funder or the university. In all cases, when a PI is involuntarily removed from a sponsored project they may not apply of additional grants or contracts until they are in good standing with the university.

Whether the transfer or replacement of a PI is voluntary or involuntary it is the responsibility of the Provost (or appropriate division Vice President) to notify the Office of Research and Sponsored Programs to ensure that work on the grant continues until a new PI has been appointed in accordance with the funding agency's policies.

<u>Distribution of responsibilities among Principal Investigators on Multi-Institutional</u> Sponsored programs:

Some grant and contract activities require the participation of more than one Institution. In such cases, the responsibilities of all participating institutions and principal investigators shall be defined in written agreements signed by the institutions' respective authorized agents. Representative examples of acceptable agreement instruments include sub awards, sub contracts and memoranda of understanding (MOU). All such agreements shall stipulate that all parties will adhere to appropriate institutional policies governing grant and contract administration and any specific sponsor requirements. Multi-Institutional grants and contracts must adhere to the Proposal Administrative Review (PAR) process administered by ORSP.

Principal Investigators proposing Multi-Institutional Sponsored Programs shall ensure receipt of completed and authorized proposals from proposed sub recipients for inclusion in the proposal prior to submission.