

Office of Research and Sponsored Programs

Principal Investigator Policy

Policy Statement

This policy provides the framework and eligibility for the role of principal investigator at Cal State East Bay.

Policy Scope

<u>The CSU Policy on the Administration of Grants and Contracts in Support of Sponsored Programs</u> defines the term "Principal Investigator" and prescribes that,

"Each campus shall include in its policy the minimum qualifications and normal responsibilities of Principal Investigator(s) for Sponsored Programs beyond those imposed by the Sponsor. The qualifications of a Principal Investigator shall include, but not be limited to, employment by the University or Auxiliary. Campus policy may establish criteria for limited exceptions for the appointment of Principal Investigators who are not employees of the University or Auxiliary, but who are officially affiliated with the University, such as individuals with emeritus status or visiting professors or researchers. The campus policy shall include provisions for reassigning the responsibilities of the Principal Investigator(s) in case of the incumbent Principal Investigator's resignation, incapacitation, or failure or refusal to perform the duties adequately. The campus policy shall also address the distribution of responsibilities among Principal Investigators for multi-institutional Sponsored Programs."

The Office of Research and Sponsored Programs will support the adherence and related processes with the following actions:

- (1) maintain procedures to comply with federal regulations,
- (2) stay abreast of new federally mandated guidelines,
- (3) seek consultation with CR, and
- (4) inform CR of any changes which require feedback from CR and the Senate.

1. Principal Investigator Eligibility

Minimum Qualifications for Principal Investigator (PI). The right to serve as the PI on sponsored grants and contracts at Cal State East Bay is automatically granted to:

- 1. Probationary (tenure-track) faculty, tenured faculty, and Emeritus* Faculty.
- 2. Individuals who have been offered a probationary (tenure track) or tenured faculty position, signed an acceptance letter, and have a pending or volunteer appointment in a college or department. PI status in these cases is granted for the purposes of proposal preparation and submission or to process a transfer of an existing grant or contract from another institution.
- 3. Individuals with a Management Personnel Plan (MPP) appointment.

Note: The eligibility of a faculty member or MPP to serve as a PI may be revoked for research misconduct, fraud, fiscal mismanagement, debarment by a sponsor, and similar improprieties.

*Emeritus faculty and faculty participating in the Faculty Early Retirement Program (FERP) should confirm that employment on a grant-funded project does not violate the terms of their retirement and should contact the AVP of ORSP about eligibility.

Provisional PI Status

Normally, the PI must be an employee of the University. Other individuals that do not meet the criteria described above may apply for Provisional PI status to serve as a PI on a grant or contract. Provisional PI status is granted for a limited period for a specific proposal, grant or contract. Provisional PI status is an internal designation and individuals will be identified as the PI (or Co-PI) to the sponsor. Lecturers may request provisional PI status but must maintain a continuous appointment during the terms of the proposal submission and award period. Fully vetted Adjunct Faculty may request provisional PI status but must be able to maintain an approved volunteer appointment or affiliation with a college or department.

The individual requesting provisional PI status must have the support and recommendation of the relevant department Chair and college Dean. The Associate Vice President (AVP) for Research and Sponsored Programs (ORSP) shall review all applications and make recommendations to the Provost. The Provost shall accept or reject the application or request further consultation with the Dean and the AVP ORSP.

If the individual intends to submit a proposal, provisional PI status must be approved before the grant application is submitted to the sponsor. Granting of provisional PI status does not imply that a proposal will be submitted by ORSP if it is not approved through the normal proposal routing process. The individual seeking provisional PI status must complete the Request for Provisional PI Status and prepare a letter of application (maximum 2 pages) that includes the following:

- 1. Summary of current research or scholarly work
- 2. Description of how the proposed work relates to the strategic mission of Cal State East Bay and how it serves faculty and students.
- 3. Previous funding and experience with grant applications.
- 4. Description of professional training and qualifications, experience in managing compliance and financial issues related to sponsored programs, and experience in supervising staff.
- 5. Description of required resources including space, computing facilities, etc.

The applicant shall provide the Request for Provisional PI Status, letter of application, and current CV to the department Chair.

2. Normal Responsibilities for PI

The PI is the individual responsible for the overall fiscal, administrative, and scientific/ programmatic conduct of a project. PIs are responsible for day-to-day project management and accept responsibility for carrying out commitments as outlined in the proposal within the time limits and budgetary resources provided, and for complying with University and sponsor policies and procedures related to the administration of funds and submission of narrative and/or technical reports. Normally, only one PI is identified. However, some sponsors permit the assignment of multiple PIs.

A *Co-Principal Investigator (Co-PI)* is typically recognized by a funding agency as an individual who shares the responsibility for the conduct of a project with the PI, including meeting the reporting requirements. A Co-PI may also be delegated spending authority and other fiscal and management related authority on an award by the Principal Investigator. A Co-PI must meet the same eligibility requirements as the PI.

3. Reassignment of PI

In cases where the incumbent Principal Investigator's resignation, incapacitation, or failure or refusal to perform the duties adequately, the Dean and AVP of ORSP shall make a recommendation to the Provost regarding the reassignment of responsibilities to another eligible individual. The Provost shall accept or reject the recommendation or request further consultation with the Dean and AVP for ORSP. The reassignment of responsibilities shall be done through a grant or contract amendment. In cases where the sponsor has specific requirements regarding the reassignment of a PI, the sponsor must be consulted and the reassignment must adhere to the sponsor's requirements.

4. PI Responsibilities for Multi-Institutional Grants

For multi-institutional Sponsored Programs, the distribution of responsibilities shall be clearly delineated in the project proposal.