



Research Office Policy 16-007

Multiple Principal Investigators on Sponsored Projects

Responsible Executive: VP for Research

Responsible Office: OSRAA

Effective: 09/01/17

Last Revised: 06/15/2017

I. Policy Statement

Oregon State University supports and encourages interdisciplinary and team approaches to research and other sponsored projects when beneficial and deemed the most appropriate method to address a sponsored activity or scientific problem. This policy is intended to provide guidance for determining the team leadership structure and management of these projects when funded by an external sponsor.

II. Reason for Policy

The U.S. Government's Office of Science and Technology Policy (OSTP) issued a memorandum in January 2005 requiring all federal research agencies to accommodate the recognition of two or more Program Directors(s)/Principal Investigator(s) (PD/PI) on research grants and contracts when appropriate and justified.

The Research Office recognizes the value of multi-disciplinary and transdisciplinary research. This policy acknowledges OSTP and federal agency implementation of this directive, while ensuring that each PD/PI receives appropriate academic and financial recognition and is given responsibility proportionate to their role on the overall project.

III. Scope & Audience

University-wide. OSU PD/Pis involved with the conduct and administration of sponsored award activities are affected by this policy.

IV. Definitions

- **Co-Principal Investigator/Co-Investigator (Co-PI/Co-I)** – Depending on the agency, this person(s) serves as an additional member of the project team. A PI/Co-I must meet all eligibility requirements for PD/PI status, and be associated with the applicant/awardee institution. The presence of more than one identified PD/PI on an application or award diminishes neither the responsibility nor the accountability of any individual PD/PI. A Co-PI/Co-I is typically considered key personnel.
- **Program Director/Principal Investigator (PD/PI)** - the individual(s) judged by the applicant organization to have the appropriate level of authority and responsibility to direct the project or program supported by the sponsor. Some agencies also use the term Lead Principal Investigator for this position. The applicant organization may designate multiple individuals as PD/Pis who share the authority and responsibility for leading and directing the project, intellectually and logistically. However, each project

does designate a Lead Program Director/Principal Investigator. Each PD/PI is responsible and accountable to the applicant organization, or, as appropriate, to a collaborating organization, for the proper conduct of the project or program including the submission of all required reports. The presence of more than one identified PD/PI on an application or award diminishes neither the responsibility nor the accountability of any individual PD/PI. The Lead PD/PI is always considered key personnel.

- Leadership Plan** – A section of the proposal describing the rationale for choosing a multiple-PD/PI approach, as well as the governance and organizational structure of the leadership team and project. The plan should include communication plans, process for making decisions on scientific direction and fiscal matters, and procedures for resolving conflicts. The roles and administrative, technical, and scientific responsibilities for the project or program should be delineated for each of the PDs/Pis and other collaborators.
- Multiple PD/PI Award** - A sponsored research project for which more than one individual is formally responsible and accountable to the sponsoring agency for the proper conduct of the project, including fiduciary and academic responsibilities and submission of all required reports.

V. Website (specific to this policy)

<http://research.oregonstate.edu/osraa>

VI. Contacts

Department	Phone Number	Website
Office for Sponsored Research and Award Administration (OSRAA)	541.737.4933	http://research.oregonstate.edu/osraa

VII. Responsibilities & Procedures

It is believed that the multiple PD/PI project option will offer important opportunities for investigators seeking support for projects or activities that require a “team science” approach and which do not fit the single-PD/PI model. The multiple PD/PI model is intended to supplement, and not to replace, the traditional single PD/PI model. The goal is to encourage collaboration among equals when that is the most appropriate way to address a scientific problem or other project activity.

The decision to apply as a single PD/PI or a multiple PD/PI project will be the responsibility of the investigators and OSU. This decision should be consistent with and justified by the scientific/specific goals of the project. Applications for multiple PD/PI awards will require additional information, such as a Leadership Plan and identification of a Contact PD/PI.

The organizational structure and governance of the PD/PI leadership team, as well as the knowledge, skills and experience of the individual PD/Pis will be factored into the sponsoring agency's assessment of the overall merit of an application. For applications designating multiple PD/Pis, the leadership approach should include designated roles and responsibilities, governance and organizational structure consistent with and justified by the aims of the project and the expertise of each of the PD/Pis.

Multiple PD/Pis on a project share the authority and responsibility for leading and directing the project, intellectually and logistically. Each PD/PI is responsible and accountable to the grantee organization, or, as appropriate, to a collaborating organization, for the proper conduct of the project or program, including stewardship of sponsor funds and the submission of required reports.

All PD/Pis will share equally in responsibility for two distinct functions:

- (i) an academic function of assuming the responsibility for the intellectual content of a sponsored project, and the ability to oversee the design, development and implementation of the project;
- (ii) a regulatory function of assuming responsibility for financial and non-financial compliance with the regulatory requirements of both the sponsor and the institution in the course of performing activities connected with the project.

Additional important considerations for designation of multiple PD/Pis:

- All PD/Pis share the responsibility and authority for leading and directing the project
- All PD/Pis must meet OSU's PI Eligibility requirements (See link in section X. below)
- All PD/Pis must be current with submission of their annual research conflict of interest disclosure forms
- All PD/Pis must be registered in a sponsor's electronic research administration system (such as eRA Commons or Fastlane) with a PD/PI role
- The first PD/PI listed in the sponsor application and designated the Lead Principal Investigator role in Cayuse SP will serve as the Contact PD/PI
- As required by the specific sponsoring agency, the Contact PD/PI may be responsible for communication between the sponsor and the rest of the leadership team
- Being named contact PD/PI does not imply any particular role within the leadership team or confer any difference in scientific stature to that person
- In consultation with OSU's Vice President for Research, another member of the PD/PI leadership team may be asked to assume the role of Contact PD/PI
- Any requested allocation of funds to components of the project for the associated PD/Pis must be included in the Leadership Plan
- Unless limited by a specific term of award, the acknowledgment of the requested budget allocation will not limit institutional authority to manage or rebudget funds between PI/PDs when deemed appropriate by the leadership team
- PD/Pis will be listed as Principal Investigators in the Investigators/Research Team screen of the Cayuse SP proposal, with the Lead Principal Investigator role designated to the Contact PD/PI

Unit/Individual Responsibilities:

A comprehensive list of OSU Roles and Responsibilities may be viewed at:

<http://research.oregonstate.edu/osraa/osraa-organization/roles-and-responsibilities>

Principal Investigator

- Uses the criteria in this policy to determine necessary documentation and planning for the leadership team structure of a multiple PD/PI project
- Reviews and complies with a sponsor's required components of a multiple PD/PI application, including additional justification and budget information
- Consults with OSRAA regarding any constraints and requirements of multiple PD/PI projects indicated in a sponsor's Request for Applications (RFA) or other guidelines
- Collaborates with other project PD/Pis to develop a Leadership Plan prior to submission of a proposal to the sponsor
- Develops a budget and budget description clearly identifying budget allocations for each PD/PI and includes these documents in Cayuse SP for OSRAA review
- Collaborates with fellow PD/Pis on the leadership team to solve differences and discrepancies in a collegial manner and consult with OSRAA and/or OSU's Vice President for Research for assistance with changing plans or dispute resolution

Business Center

- Assists PD/PI as needed with necessary information to include in the proposal and/or post-award request to change project plans, including changes to PD/PI funding allocations or spending plans

Office for Sponsored Research and Award Administration

- Provides guidance in the interpretation of federal and sponsor requirements
- Reviews and approves the proposed application, including Leadership Plan and budget allocations, prior to submitting the proposal
- Reviews and approves proposed changes to the Leadership Plan and/or budget allocations for funded projects, and advises PD/Pis as to whether changes require sponsor prior approval

Procedure

Once the PD/Pis have determined that the project is best served with a multiple PD/PI approach, the application should be prepared according to the specific sponsor's requirements and include a Leadership Plan with a description of all considerations listed in this policy. (See link in section VIII. for sample Leadership Plans)

A budget indicating funding allocations for each PD/PI should be uploaded to the Cayuse proposal record, prior to routing through departmental and college approvers.

Each PD/PI must be listed in the Investigators/Research Team screen of Cayuse SP, with a designation of Lead Principal Investigator (for the Contact PD/PI) or Principal Investigator, so

that the proposal is routed to the PD/PIs Department Head and Dean for approval of their participation on the leadership team of the project.

Specific sponsoring agencies may elaborate on the criteria for PD/PIs in their guidelines and RFAs, giving examples of what does and does not qualify as a PD/PI for particular kinds of projects, as well as the specific nomenclature that will be employed in implementation of the multiple PD/PI concept.

Proposals for multiple PD/PI projects should include all standard components of an application, meeting both the sponsoring agency and OSU requirements for documentation in addition to supplementary requirements for the multiple PD/PI structure. Upon receipt of the Cayuse proposal, OSRAA will consult with the PD/PIs if additional information is needed prior to submission.

Each multiple PD/PI Leadership Plan should include a discussion of how disputes will be handled. It is expected that the PD/PIs shall attempt to resolve any dispute informally. In the event that the PD/PIs cannot reach an informal resolution, resolution will be handled at the Dean's level if all PD/PIs reside within a specific college. If the PD/PIs reside within more than one college, the resolution will be handled between the respective Deans. If the respective Deans cannot reach resolution, then the Vice President for Research becomes responsible for dispute resolution.

VIII. Forms & Tools

[NIH Examples of Project Leadership Plans for Multiple PI Grant Applications](#)

Frequently Asked Questions

IX. See OSRAA website

X. Related Information

[Office of Science and Technology Policy \(OSTP\) Agency Recognition of Multiple Principal Investigators on Federally Funded Research Projects](#)

[National Institutes of Health - Establishment of Multiple Principal Investigator Awards for the Support of Team Science Projects](#)

[National Institutes of Health - Revised Multiple Program Director\(s\)/Principal Investigator\(s\) Policy to Allow Change with Prior Approval](#)

[National Institutes of Health – Frequently Asked Questions, Multiple Principal Investigators](#)

[National Science Foundation – Multiple Principal Investigator Implementation Plan](#)

Related OSU Policies:

[Principal Investigator Eligibility](#)

XI. History

Last review date: 7/1/16

Next scheduled review date: 6/30/19

Original issue date: Effective 06/01/17

Note: The Office of University Compliance will attempt to track the original issue date of policy and revision dates to existing policies but will not publish this information on the website.