Research Office Policy 19-001

Principal Investigator Eligibility

I.   Policy Statement

Oregon State University (OSU) is responsible for ensuring that sponsored awards are managed by qualified technical, financial, and administrative personnel. Principal Investigators maintain ultimate responsibility for completion of the technical and scientific aims of a project, as well as some of the financial and administrative requirements of an award. This policy outlines who may serve as Program Director/Principal Investigator (PD/PI) on sponsored projects received by OSU. A college or unit may have a more restrictive policy regarding who may serve as PD/PI.

II.   Reason for Policy

OSU must have a means to identify personnel able to lead the intellectual scope of a sponsored project, as well as manage the requirements of an award, which may include compliance with financial and administrative requirements found in the OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR §200) ("Uniform Guidance"), specific sponsored award terms and conditions, and university policy.

III.   Scope & Audience

University wide. Approving colleges, departments and other units, as well as OSU personnel 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. There are occasions where a Co-PI/Co-I is associated with a collaborating 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.

- **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 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.

- **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 PDs/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.

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

The PD/PI is a member of the institution who bears responsibility for the intellectual leadership of a project. The PD/PI accepts overall responsibility for directing the research/technical scope of the project, the financial oversight of the award's funding, and compliance with relevant university policies and sponsor terms and conditions of award.

Assistant Professors, Associate Professors, Professors, Research Associates, Instructors, Emeritus Faculty, Post Docs, and Courtesy Faculty may serve as Principal Investigators on a proposal.

Special considerations for specific OSU appointments

- **Courtesy Faculty:** Courtesy Faculty members are not employees and may not receive compensation for services performed, including work on sponsored projects. If paid effort from a sponsored project is desired or planned, a change of appointment type through the affiliated OSU department is required.

- **Emeritus Faculty:** Emeriti members of the university retain the PI eligibility that they held prior to their retirement. Emeritus PIs may be paid salary from a sponsored project through a part-time appointment in their academic department, such as the 1039-hour appointment for retired OSU employees.

  Emeritus faculty who are not paid directly from the project may contribute their personal project effort as cost share. This cost share will be documented by the PI's completion of a Third Party Cost Share form and the value of the contribution is determined by the last rate of pay prior to retirement from OSU.

- **Graduate Students:** Unless designation of the graduate student as Lead PD/PI is required by a sponsoring agency's program announcement or proposal guidelines (such as for many fellowship proposals), graduate students may not serve as a PD/PI, but may serve as Co-PI on any sponsored project proposal.

  If a graduate student will become a Post Doc at OSU before the commencement of a project, the student can be listed as the Lead PD/PI, however, this requires verification by the department through a letter, email, or text note in Cayuse, indicating their appointment and start date.

  Note: University Policy 580-020 prohibits one from simultaneously holding the status of faculty member (all unclassified positions; those with and without rank) and graduate student. Students are considered to be in active student status from the time of matriculation until degree certification and, thus, are ineligible for faculty positions unless the Dean of the Graduate School has granted an exception to the University Policy. Criteria by which exceptions may be considered are found at the [Graduate School website](#)*. This policy applies during fall, winter, spring and summer terms.*

- **Research Assistants and no-rank faculty**: Research Assistants and no-rank faculty may serve as PD/PIs with approval of the Department/Unit Head. A Department/Unit Head's approval of the Cayuse proposal designating a Research Assistant or no-rank faculty as the Principal Investigator will serve as the Department/Unit Head's recognition that they accept responsibility for ensuring that the PD/PI discharges all appropriate functions for the sponsored project if an award is made for the proposed activities.

- **Affiliate Faculty**: Affiliate faculty may not serve as Principal Investigators on proposals.

ROLES AND RESPONSIBILITIES

A comprehensive list of OSU Roles and Responsibilities may be viewed at:
http://research.oregonstate.edu/osraa/osraa-organization/roles-and-responsibilities

Office for Sponsored Research and Award Administration

- Assist the college, department/unit or individual in determining whether an OSU employee qualifies to serve as Principal Investigator for a sponsored project

- Interpret requirements in the program announcement, proposal guidelines and the terms of sponsored awards and provide guidance to PI, college/unit and Business

Center regarding sponsor requirements for an individual to serve in the Principal Investigator role

- Review and approve Principal Investigator roles assigned in a Cayuse proposal record or communicate with PI and college/unit if there are questions about the PD/PI designations

Business Center, College or Unit-Level Proposal Support Staff

- Contact OSRAA for assistance in determining PI eligibility, as needed

Department/Unit Head

- Review Lead PD/PI and Co-PI assignments in Cayuse proposals prior to approving the proposal record

- Recognize that the Department/Unit Head approval of the Cayuse record acknowledges the Department/Unit Head's responsibility for ensuring that the PD/PI discharges all appropriate functions for the sponsored project if an award is made for the proposed activities

- Recognize additional department/unit responsibility for projects under the direction of non-traditional PD/PIs, such as Research Assistants, no-rank, courtesy and emeritus faculty

Principal Investigator

- Confirm eligibility to serve as PI by reviewing this policy and appointment type for PD/PI and any Co-PIs

- Review OSU's policy for Multiple PDs/PIs on Sponsored Projects when a proposal will include more than one PD/PI responsible and accountable for the conduct of a project

- Be aware of the sponsored award terms and conditions and additional responsibilities accepted when serving as PD/PI

- Contact OSRAA for assistance in determining PD/PI eligibility and/or interpretation of sponsor requirements for project personnel

- Perform all required technical and administrative duties required of PD/PI

VIII.   Forms & Tools

Frequently Asked Questions

See OSRAA Website

IX.   Related Information

OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, Appendix I to Part 200 – Full Text of Notice of Funding Opportunity

OSU Academic Appointment Guidelines

OSU Policy: Multiple Principal Investigators on Sponsored Projects

X.   **History**
        Last review date: 9/1/2018
        Next scheduled review date: 9/1/2020

        Original issue date: Effective 9/1/2018

        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.