



BROWN

Principal Investigator Eligibility Policy

I. Background

Principal Investigator (or co-Principal Investigator or Program Director) is the individual(s) who is approved by the University and the sponsor to design, execute and manage an externally sponsored project. The Principal Investigator (PI) has full authority for the programmatic, scientific or technical direction of the research and its financial management.

While grants, contracts and cooperative agreements are awarded to the University, not to the individual PI, it is the PI who has the responsibility for direction of the research project and compliance with governing sponsor and University policies and regulations and applicable state or federal laws. The University is responsible for maintaining an infrastructure of administrative support that facilitates the research efforts of the faculty.

II. Eligibility criteria

In order for the University to fulfill its role as award recipient it is necessary for the PI to maintain at least one of the following affiliations with the University:

1. Employed by the university as a **faculty member (all ranks)** including “research” faculty. Faculty appointment types are defined in the [Handbook of Academic Administration](#). **Emeritus faculty holding a Research** appointment may also serve as PI with the approval of the appropriate dean or department chairperson and for the Division of Biology and Medicine, the additional approval of a senior officer.

Employed by an affiliated hospital and hold a **Clinical appointment in the Program in Biology or in the Warren Alpert School of Medicine**. Although generally employed by affiliated hospitals, clinical faculty are considered University faculty for the purpose of serving as a PI and submitting proposals for external support with prior written authorization of Dean of Medicine & Biological Sciences, or Associate Dean of Biology.

2. Appointed as **adjunct faculty or visiting faculty** with approval of the school’s dean, department chairperson, center, program or institute director. Such individuals may serve as a PI in the Division with the written authorization of the Dean of Medicine and Biological Sciences, or Associate Dean of Biology.

3. Appointed as a **post-doctoral fellow, research associate, research fellow, faculty fellow** or equivalent.¹
4. Enrolled as a **graduate student** at the University and with the approval of the school's dean, department chairperson, center, program or institute director.
5. Employed as an **exempt staff member**, including technical staff, administrative staff, and research staff, or a staff member having emeritus title, with approval by the school's dean, department chairperson, center, program, institute director *or senior University officer (i.e., Office of the Vice President for Research)*. BioMed requires both department chairperson and senior University officer approval for exempt staff to serve as PI.

III. Requests for Exceptions

Brown University does not ordinarily grant PI rights to individuals who do not hold a Brown appointment or employment. Exceptions can be made in limited circumstances when dictated by sponsor's funding opportunity announcement (i.e., the NSF GOALI program.)

Individuals not meeting the above eligibility criteria may request written permission from the Office of the Vice President for Research; Dean of Medicine and Biological Sciences, Schools of Public Health or Engineering; or appropriate senior University Officer (e.g., VP CIS) for an exceptional approval to serve as PI. Such requests must be made well in advance of proposal submission due dates. A copy of the approval shall be included in the proposal record.

IV. Other University and Sponsor requirements²

In addition to meeting the criteria for PI eligibility, the PI must ensure that other University requirements for review and approval of external proposals will be satisfied, including:

¹ These appointments may allow for sponsorship (financial support) from other sources that either (1) require the involvement and approval of the University, e.g., NIH Post Doctoral Fellowships, Intergovernmental Personnel Act Agreements, etc., or (2) do not require any University involvement e.g., Guggenheim or Fulbright Fellowships.

² The National Institutes of Health (NIH) has formalized a Multiple Principal Investigator/Project Director model whereby "*the overarching goal is to maximize the potential of team science efforts in order to be responsive to the challenges and opportunities of the 21st century*" (see https://grants.nih.gov/grants/multi_pi/). The contact PI will serve as Brown's responsible individual for the execution of the project and be deemed 'lead' PI for University reporting and compliance purposes.

- the performance period of the proposed externally sponsored activity reflects the expectation of the university's commitment to the activity;
- the school's dean, department chairperson, center, institute or program director or designee has endorsed the proposal in advance of submission;
- any cost sharing arrangements have been approved in writing and in advance by the appropriate University officers;
- any additional space needs or support services have been identified and committed through appropriate channels.

In addition to the University requirements for Principal Investigator eligibility described above, some sponsor programs may limit or restrict eligibility of University proposals. For example, there may be a limit on the number or specific types of proposals that may be submitted from Brown to a particular program. In such cases, the Office of the Vice President for Research will decide which proposals may be sent forward for review by an external agency.

Related University Policies:

- [Brown University Institutional Animal Care and Use Committee Policy on Principal Investigator Eligibility and Responsibilities](#)
- [Brown University Human Research Protection Program Policy and Procedure Manual: Investigators](#)

Policy Owner: The Office of the Vice-President for Research

Contact Person for Policy: Patrice A. Carroll, Director, Office of Sponsored Projects

Approved on: May 1989

Last updated on: October 10, 2017