

 BROWN	Principal Investigator Eligibility for Externally Sponsored Awards	POL # Pending
		Effective Date: January 1, 2020

1.0 Policy Purpose

This Policy establishes the eligibility requirements for serving as a Principal Investigator on an externally sponsored project at Brown University. The policy ensures that sponsored projects are conducted by those who have the requisite training, skill, commitment and resources as well as the appropriate relationship to the University.

2.0 To Whom the Policy Applies

This policy applies to all individuals seeking approval to serve as Principal Investigator, Co-Principal Investigator or Project Director on an externally sponsored project. Eligibility criteria by academic and/or professional title is defined in Appendix A.

Note: The terms Principal Investigator (PI), Co-Principal Investigator (co-PI) and Project Director (PD) are used interchangeably throughout this policy.

3.0 Policy Statement

The PI(s) is the individual(s) who is approved by the University and the sponsor to design, execute and manage an externally sponsored project. The PI has full authority for the programmatic, scientific or technical direction of the research and its financial oversight. While grants, contracts and cooperative agreements and other binding 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.

3.1 Eligibility Criteria

Brown University follows a two-tiered process for determining PI eligibility. Those PIs deemed eligible by the policy (i.e., ‘automatically’ eligible to serve as PI) and those exceptionally approved to serve as PI which will require an additional level of review. The former category is affirmed at the proposal submission stage through the Department Chair, Dean, University Librarian or Center/Institute Director’s approval. The latter category is approved by the Vice President for Research (VPR) or Dean of Biology & Medicine for Alpert Medical School (AMS) after endorsement by Department Chair, Dean, University Librarian and/or Center, Institute Director. Academic units (e.g., AMS, School of Public Health (SPH), School of Engineering (SOE)) may add additional Senior Officer approval at their discretion. Center Directors in units such as Leadership Alliance, Swearer Center, Bell Gallery, Haffenrefer Museum and The Policy Lab retain full Principal Investigator eligibility. PI eligibility approvals submitted by Deans, Directors and/or Senior Officers for specific

individuals will be maintained by Office of the Vice President for Research (OVPR) and are deemed to be a permanent approval for future sponsored activity (i.e., identical requests for the same individual to submit proposals is not required). The University is responsible for maintaining an infrastructure of administrative support that facilitates the research efforts of the faculty.

These requirements are pertinent to all proposals seeking monetary or non-monetary support of a sponsored project which, if awarded to Brown University will be governed by a contract, grant, cooperative agreement or other binding agreement. The policy requirements must be addressed before submission of a proposal or application to an external sponsor. Customarily this is documented in the grants management system during proposal development, review and approval.

3.2 Individuals Not Meeting the Eligibility Criteria

Individuals not meeting the eligibility criteria may request written permission from the Office of the Vice President for Research or Dean of Medicine and Biological Sciences for an exceptional approval to serve as PI, after securing permission of the senior officer in the school/department/center/institute or library. Such requests must be made well in advance of proposal submission due dates using the University's designated form to document approvals. A copy of the approval must be included in the proposal record.

OVPR has recorded and affirms the PI eligibility of those individuals who were exceptionally approved to serve as PI through December 31, 2019. These are individuals whose names appear in the Coeus grants management system as PI, co-PI on submitted proposals and/or awards.

3.3 New Tenure-Track Faculty

New Tenure-track faculty become eligible to serve as Brown PI for up to 12 months prior to the Brown appointment start date for proposal submission. Departing tenured/tenure-track faculty are eligible to serve as PI for up to 24 months from the end of the appointment to engage in closeout activities (e.g., final technical reports, approval of subcontractor invoices, disposition of property), and to mentor project-supported graduate students. A permanent Brown faculty member must be named as Co-PI for exiting faculty so there is continuity of university affiliation in these cases.

3.4 Individuals Who Do Not Hold a Brown Appointment or Employment

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.). These exceptions are approved by the VPR or Dean, AMS.

3.5 Limited Submission Funding

In addition to the University requirements for Principal Investigator eligibility described in Appendix A, some funding opportunities 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. Management of all Brown University 'limited submission' funding opportunities rests with the OVPR.

4.0 Definitions

For the purpose of this policy, the terms below have the following definitions:

- 4.1 **Principal Investigator (PI):** This title identifies the individual responsible for the conduct of the sponsored program project. This responsibility includes the intellectual conduct of the project, fiscal accountability, administrative aspects, and the project's adherence to relevant policies and regulations. A project may have multiple individuals as PIs, who share the authority and responsibility for leading and directing the project, intellectually and logistically. Each PI is responsible and accountable for the proper conduct of the project.
- 4.2 **Co-Principal Investigator:** This designation refers to individuals who share the responsibility for the project with the Principal Investigator and therefore requires the same qualifications.
- 4.3 **Project Director:** Although not as commonly used by sponsors, this title is a synonym for Principal Investigator.
- 4.4 **Multi-PI:** This is a National Institutes of Health (NIH) – specific term. This designation supplements the traditional single-PD/PI model and allows applicants and their institution to identify more than one PD/PI on a single grant application. In the NIH Notice of Grant Award, a "contact" PI is identified who will serve as Brown's responsible individual for the execution of the project and be deemed 'lead' PI for University reporting and compliance purposes.

5.0 Responsibilities

All individuals to whom this policy applies are responsible for becoming familiar with and following this policy. University supervisors are responsible for promoting the understanding of this policy and for taking appropriate steps to help ensure compliance with it. Specific responsibilities include:

Principal Investigator: The Principal Investigator (PI) holds a number of responsibilities related to sponsored projects, the core of which is conducting the work for which external funding has been received. In addition to meeting technical requirements on a sponsored project, the PI also has administrative responsibilities such as assuring that expenditures are made for the intended purpose of the project and in accordance with sponsor requirements and University policy. The technical requirements involve submitting timely periodic and final narrative reports on the progress of the project and overseeing others who may contribute to the project, including University employees, consultants, and subcontractors. The PI must oversee the proper reporting of Intellectual Property (i.e., patents, licenses, copyrights) and equipment. The PI must ensure individuals paid from their sponsored project are in compliance with the University Effort Reporting policies and that all expenditures are allocable and allowable under sponsor and university guidelines.

Departmental/Center/Institute/Library Research Administrator (DRA): Administrators located in academic departments, centers, institutes or library who assist faculty in the process of development and submission of proposal for central office review. DRA will secure appropriate documentation of PI eligibility exceptions for the proposal record.

Sponsor: A sponsor may be a government agency (federal, state, local or international), a foundation, a private corporation or a non-profit organization. Sponsors differ in the type of proposals they accept, the type of award offered (e.g., grant, contract, cooperative agreement, other transaction), their method of payment, the terms of their awards and the types of cost they will reimburse.

Office of the Vice President for Research (OVPR): The mission of OVPR is to advance and elevate research at Brown by identifying opportunities and developing and supporting leading-edge research programs. The office provides strong infrastructure for research and development, effective administration of projects, and timely dissemination of results. The OVPR is responsible for recording PI eligibility information and providing approvals of exceptional PI requests.

Office of Sponsored Projects (OSP): The Office of Sponsored Projects supports Brown University faculty and staff in the acquisition, performance, and administration of projects and programs funded from external sources. Pre-Award Staff in OSP are responsible for reviewing and approving proposal submissions to external sponsors, ensuring the criteria for PI eligibility have been met in accordance with this policy.

BioMed Research Administration (BMRA): BMRA has authority to submit grant proposals to external sponsors on behalf of certain departments and centers in the Alpert Medical School. During proposal submission review, BMRA ensures that the criteria for PI eligibility have been met in accordance with this policy.

6.0 Consequences for Violating this Policy

Proposals submitted without prior authorization by either the Office of Sponsored Projects or BioMed Research Administration are subject to withdrawal from the sponsor or the declination of an award. The decision to withdraw an unsanctioned proposal or decline an award lies solely with BMRA or with OVPR/OSP as appropriate.

Failure to comply with this and related policies is subject to disciplinary action, up to and including suspension without pay, or termination of employment or association with the University, in accordance with applicable (e.g., staff, faculty, student) disciplinary procedures.

7.0 Related Information

Brown University is a community in which employees are encouraged to share workplace concerns with University leadership. Additionally, Brown's Ethics and Compliance Reporting System allows anonymous and confidential reporting on matters of concern online or by phone (877-318-9184).

The following information complements and supplements this document. The information is intended to help explain this policy and is not an all-inclusive list of policies, procedures, laws and requirements.

7.1 Related Policies

- Handbook of Academic Administration
- Proposal Submission Policy and Guidelines
- Award Management Policies
- Financial Reporting and Closeout Policy
- Direct Charging Policy
- Subaward Management
- Cash Management
- Cost Transfers
- Financial Reporting
- Cost Sharing
- Effort Reporting
- NIH Salary Cap
- Summer Salary
- Sponsored Travel Policy
- Terms and Conditions in Sponsored Research Agreements
- Openness in Research
- Conflict of Interest in Research
- Conflict of Interest and Commitment
- 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
- Patent and Invention Agreement under External Grants and Contracts

7.2 Related Procedures

- Proposal Review and Submission
- Change of Principal Investigator and/or Department during an active project period
- Research Data Management and Sharing Plans

7.3 Related Forms

- Principal Investigator Exceptional Approval Form
- Change of Principal Investigator/Department Form

7.4 Frequently Asked Questions (FAQs)

- "How Do I" questions on the OVPR Web site

7.5 Other Related Information

- PI Effort requirements on federal awards at 2CFR200.306(k)
- Revision of Budget or Program Plans (i.e., PI Disengagement)– The federal Uniform Guidance recognizes that PIs can be away from campus and remain engaged in the project. Prior approval from federal awarding agencies must be obtained for the following program or budget-related reasons (UG 200.308):
- Change in scope or objective of the project, or change of a key person identified in the grant application
- Disengagement from the project for more than 3 months or 25% reduction in PI level of effort (OMB 2001/UG)

- Chart of Requirements for Principal Investigator Eligibility, Appendix A

8.0 Policy Owner and Contact

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

8.2 Policy Approved by: Vice President for Research

8.3 Contact Information: Director, Office of Sponsored Projects

- Name: Patrice A. Carroll
- Telephone: 401-863-3141 or 401-863-277
- Email: Patrice_carroll@brown.edu or resadmin@brown.edu

9.0 Policy History

9.1 **Policy Effective Date:** January 1, 2020

9.2 **Policy Last Reviewed:** Pending Approval

9.3 **Policy Update/Review Summary:** Refines academic and professional titles eligible to serve as PI. Removes Adjunct, Instructor, Lecturer, Professor of the Practice and Visiting titles from 'automatic' PI eligibility. Introduces requirements for screening of visiting faculty. Establishes term limits for incoming and exiting faculty. Provides guidance on obtaining exceptions to the eligibility requirement. Establishes new form and signature authorization for exceptional PI approvals.

Appendix A: Principal Investigator (PI) Eligibility for Externally Sponsored Awards

Brown University faculty and staff appointment type	Requirements for PI Eligibility
Assistant Professor, Associate Professor, Professor (includes Hospital-based faculty holding a clinical appointment at AMS)	<div style="display: flex; justify-content: space-between; align-items: center;"> <div> <p>● PI Eligibility authorized by Policy.</p> </div> <div style="border: 1px solid black; padding: 5px;"> <p style="text-align: center; margin: 0;"><u>ColorKey</u></p> <p style="margin: 0;">● Automatically eligible per policy</p> <p style="margin: 0;">● Additional approvals may be required</p> <p style="margin: 0;">● Eligible by exception only</p> </div> </div>
Research Academic appointments (Professor, Associate, Assistant) - includes University Librarian, and Center Directors	<p>● PI Eligibility authorized by Policy.</p>
Emeritus faculty including Emeritus faculty with "Research" appointment	<p>● Emeritus faculty may seek approval from the appropriate Dean for a "(Research)" appointment prior to proposal submission if the salary for the individual is budgeted. Emeritus faculty not seeking salary may proceed to submit proposals as per the practices of their academic unit. Approvals will be granted on a case by case basis.</p>
Postdoctoral Research Associate, Postdoctoral Fellow, Postdoctoral Research Fellow	<p>● PI Eligibility authorized by Policy.</p>
Undergraduate, Graduate Student, Medical Student	<p>● PI Eligibility authorized by Policy. Requires a named Brown Faculty Mentor/Advisor if not apparent on grant application. This PI appointment type is restricted to fellowships, doctoral dissertation improvement, graduate fellowships. Graduate and undergraduates are not ordinarily allowed to serve as PI on research grants.</p>
Adjunct - Professorial, Lecturer, Instructor	<p>● Eligible by exception. Requires VPR approval, regular review and PI Exception Form. Academic units may add additional Senior Officer approval at their discretion. AMS does not generally allow Adjuncts to submit proposals, as a "(Research)" appointment is required.</p>
Instructor, Senior Lecturer, Lecturer	<p>● Eligible by exception. Requires VPR approval, regular review and PI Exception Form. Limit to single project basis and term limited approval. *Note: Instructor with suffix "(Research)" appointments at AMS which have PI automatic eligibility.</p>
Professor of the Practice (Assistant, Associate)	<p>● Eligible by exception. Requires VPR approval, regular review and PI Exception Form. Limit to single project basis and term limited approval.</p>
Visiting - Professorial, Lecturer, Instructor	<p>● Eligible by exception. Requires VPR or Dean AMS approval and PI Exception Form. A named Brown faculty co-PI/co-I is required on proposals and awards. Approval is limited to those holding appointments at a faculty-equivalent or senior rank, for a single project basis and term limited. Screening in Visual Compliance, IP rights assignment and COI Disclosure will ordinarily be required at the time of proposal submission.</p>
Research Staff (non-faculty) - Investigator, Senior Research Associate, Research Associate, Research Fellow	<p>● Eligible by exception. Requires VPR approval, regular review intervals and PI Exception Form. Requires employee status, limit to single project and term limited.</p>
Exempt Staff including technical staff and administrative staff	<p>● Eligible by exception. Requires Department Chair, Dean and/or VP level approval, regular review and PI Exception Form. Restricted to full-time employees. Approval granted on single project basis and term limited.</p>