



## Principal Investigator Eligibility for Externally Sponsored Awards

POLICY NO.	ISSUE DATE	EFFECTIVE DATE
10.15.01	January 1, 2020	August 22, 2023

### 1.0 Policy Purpose

The purpose of this policy is to establish the eligibility requirements for an individual to serve as a Principal Investigator (PI) on an externally sponsored project at Brown University and to ensure 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 to serve or currently serving as PI, Co-Principal Investigator (Co-PI) or Project Director (PD) on an externally sponsored project.

For purposes of this policy, all uses of “PI” include and incorporate PIs, Co-PIs, and PDs, unless otherwise stated.

### 3.0 Policy Statement

The PI is the individual approved by the University and the relevant 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, cooperative agreements and other binding agreements are awarded to the University, not to the individual PI, the PI is responsible for directing the research project and complying with governing Sponsor and University policies and regulations as well as applicable state and federal laws.

#### 3.1 Eligibility Criteria

PI eligibility is determined largely by appointment type (i.e., academic and/or professional title) and is divided into three categories:

- individuals automatically eligible to serve as PI by virtue of their title or position at Brown;
- individuals eligible to serve as PI with prior written approval; and
- individuals eligible to serve as PI by exception.

The PI Eligibility Requirements Chart (<https://docs.google.com/spreadsheets/d/1tS3fK-MIBNb2ehO2jzuXNntC2VpR0fZ9/edit#gid=1753023849>) is an online reference tool that reflects this policy and any additional eligibility considerations or processes relevant to a particular unit or title. The terms of this policy govern in the case of any inadvertent conflict between the policy and the Chart.

PI eligibility requirements apply to all proposals for monetary or non-monetary support of a project from a Sponsor that, if awarded to Brown, will be governed by a contract, grant, cooperative agreement or other binding agreement between Brown and the Sponsor. PI eligibility must be confirmed or approved before Brown submits a proposal or application to a Sponsor for which that individual will be identified as PI. Eligibility must be documented in the grants management system during proposal development, review, and approval.

### 3.1.1 Automatically Eligible

Individuals who are automatically eligible to serve as PI are the following:

- Assistant Professor, Associate Professor, and Professor, including hospital-based faculty holding a clinical faculty appointment at The Warren Alpert Medical School of Brown University
- Assistant Professor of the Practice, Associate Professor of the Practice, Professor of the Practice at the School of Public Health and School of Engineering, and in departments and other units reporting to the Dean of Faculty
- Research Academic appointments (Assistant Professor, Associate Professor, Professor) identified as “non-Regular” faculty in the Handbook of Academic Administration
- University Librarian
- Brown University Center/Institute Director (e.g., the Directors of the Annenberg Institute, Carney Institute for Brain Science, and Swearer Center for Public Service)
- Postdoctoral Research Associate, Postdoctoral Fellow, Postdoctoral Research Fellow, with the exception of Postdoctoral Research Associate, Postdoctoral Fellow, Postdoctoral Research Fellow in the Division of Biology & Medicine for whom automatic eligibility is restricted to fellowships and mentored awards.

### 3.1.2 Eligible with Approval

Individuals who may be eligible to serve as PI with prior written approval are the following:

- Emeritus faculty without a "research" appointment
- Undergraduate, graduate, or medical students, and only with a named Brown faculty mentor or advisor

Once approved, the individual may serve as PI for future sponsored activity unless or until that individual's status or position at Brown changes. For example, an undergraduate student with approval to serve as PI may serve as PI so long as the individual is an undergraduate student. If that undergraduate student becomes a graduate student—a new status at Brown—a new review and approval must be obtained.

In order for one of the above-named individuals to be approved to serve as PI, the relevant Department Chair, Dean, University Librarian and/or Center/Institute Director must endorse the individual for eligibility as a PI. After this endorsement, the Vice President for Research (VPR) will review and may approve the individual's eligibility in writing within the VPR's discretion. Individual University Units may add additional reviews or approvals by senior officers to this process.

### 3.1.3 Eligible by Exception Only

Individuals who may be eligible to serve as PI by exception for a specific project or proposal are the following:

- Adjunct Professor, Adjunct Lecturer, Adjunct Instructor
- Instructor, Senior Lecturer, Lecturer
- Assistant Professor of the Practice, Associate Professor of the Practice, and Professor of the Practice outside of the School of Public Health, and School of Engineering, and departments and other units reporting to the Dean of Faculty
- Visiting Professor, Visiting Professor of the Practice, Visiting Lecturer, Visiting Scholar, Visiting Instructor and any other title that includes a Visitor or Visiting designation
- Research Staff (non-faculty), such as Investigator, Senior Research Associate, Research Associate, Research Fellow
- Exempt Staff, including technical staff and administrative staff

An individual with one of the listed titles or appointments in this section 3.1.3 may request that the VPR grant an exception to this policy to permit that individual to serve as PI for a specific proposal or project if and after the individual receives written endorsement from the senior officer in the relevant school, department, center, institute or library. The VPR reviews these requests on a case-by-case basis and, if the VPR grants an exception, eligibility to serve as PI applies only to the specific proposal or project. Such requests must be made well in advance of proposal submission due dates using the University's designated form to request exceptions. A copy of the exception must be included in the proposal record.

## 3.2 New and Departing Tenure-Track Faculty

With an appropriate endorsement from the department and school/center/institute or library and concurrence of the VPR, PI eligibility is available for incoming and outgoing researchers.

- Newly appointed tenure-track faculty are eligible to serve as PIs on proposals submitted by Brown for up to 12 months prior to their Brown appointment start date.
- Departing full-time tenured and tenure-track faculty are eligible to continue to serve as PI for up to 24 months after their appointment end date to engage in award closeout activities (e.g., final technical reports, approval of subcontractor invoices, disposition of property) and to mentor project-supported graduate students. In these cases, the relevant department must name another full-time tenured or tenure-track Brown faculty member as Co-PI to maintain University affiliation with the research project. A new Co-PI must be named when Brown will issue a subaward to the departing faculty member's new institution for which subaward the departing faculty member will serve as PI. Prior written approval from the VPR is required for departing PIs who are not full-time tenured or tenure-track faculty members and who have other academic or staff appointments at Brown to continue to serve as PI on Brown awards. These are reviewed on a case-by-case basis.

## 3.3 Individuals Who Do Not Hold a Brown Appointment or Employment

Individuals who are not Brown employees or who do not hold a Brown appointment cannot serve as PIs on externally sponsored projects at Brown. The University, within its discretion, can make exceptions to this rule in limited circumstances when dictated by the Sponsor's funding opportunity announcement and with written prior approval from the VPR.

## 3.4 Animal and Human Subjects Research

PIs involved in animal and/or human subjects research must also adhere to PI eligibility criteria in Brown University Institutional Animal Care and Use Committee Policy on Principal Investigator

(<https://www.brown.edu/research/sites/research/files/Final%20PI%20Requirements%20Policy%20June17.pdf>) Eligibility and Responsibilities

(<https://www.brown.edu/research/sites/research/files/Final%20PI%20Requirements%20Policy%20June17.pdf>) and/or in the Brown University Human Research Protection Program Policy and Procedure Manual: Investigators (<https://www.brown.edu/research/guidance-policies>), as applicable.

Approval to serve as PI on a sponsored project does not confer approval to serve as PI on an HRPP or IACUC protocol.

## 3.5 Limited Submission Funding and Internal University Funding

In addition to the requirements for PI eligibility, funding opportunities may limit or restrict PI eligibility for certain University proposals. For example, a funding Sponsor may limit the number or specific types of proposals that Brown may submit for a particular program or award. Management of and decision-making authority regarding all Brown University limited submission funding opportunities rests with the OVPR.

This policy sets forth PI eligibility requirements for externally sponsored projects. University internal funding opportunities (e.g., Research Seed Awards and Salomon Faculty Research Awards) have their own requirements set forth in the opportunity or otherwise by the relevant University unit.

## 4.0 Definitions

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

**Co-Principal Investigator (Co-PI):** An individual who shares the responsibility for the project with the Principal Investigator and therefore must meet the same qualifications.

**Principal Investigator:** 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 (Co-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.

**Project Director:** A synonym for Principal Investigator, less commonly used by Sponsors.

**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. A Sponsor is the funder or supporter of

a project and sets the terms and conditions for its performance. For the purposes of this policy, Sponsor does not include Brown as sponsor (i.e., internal awards).

## 5.0 Responsibilities

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

**Principal Investigator:** The 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 PI is also responsible for apprising OSP of any changes in the PI's position at Brown or of any other circumstances that may impact their eligibility.

**Office of Sponsored Projects (OSP):** Supports Brown all 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 and ensuring the criteria for PI eligibility have been met in accordance with this policy.

**BioMed Research Administration (BMRA):** BMRA has limited authority to submit grant proposals to external sponsors on behalf of certain departments and centers in the Warren Alpert Medical School of Brown University. During proposal submission review, BMRA is responsible for ensuring 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 OSP or BMRA 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 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 Anonymous Reporting Hotline (<https://compliance.brown.edu/reporting-concerns>) 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 (<https://www.brown.edu/about/administration/dean-of-faculty/handbook-academic-administration>)
- Proposal Submission Policy and Guidelines (<https://www.brown.edu/research/institutional-facts-reference-documents/proposal-submission-policy-guidelines>)
- Award Management Policies (<https://www.brown.edu/research/conducting-research-brown/managing-award/award-management>)
- Financial Reporting and Closeout Policy (<https://www.brown.edu/research/conducting-research-brown/managing-award/award-management/financial-reporting-and-closeout-policy>)
- Direct Charging Policy (<https://www.brown.edu/research/conducting-research-brown/managing-award/award-management/direct-charging-policy>)
- Subaward Management (<https://www.brown.edu/research/conducting-research-brown/preparing-and-submitting-proposal/proposal-review-submission-osp/subawards-lifecycle>)
- Cash Management (<https://www.brown.edu/research/conducting-research-brown/managing-award/award-management#cashmanagement>)
- Cost Transfers (<https://www.brown.edu/research/conducting-research-brown/managing-award/award-management/cost-transfer-policy>)
- Financial Reporting (<https://www.brown.edu/research/conducting-research-brown/managing-award/award-management/financial-reporting-and-closeout-policy>)

- Cost Sharing (<https://www.brown.edu/research/conducting-research-brown/preparing-proposal/proposal-review-submission-osp/cost-sharing-sponsored-projects>)
- Effort Reporting (<https://www.brown.edu/research/conducting-research-brown/managing-award/award-management/effort-reporting-policy>)
- NIH Salary Cap (<https://www.brown.edu/research/conducting-research-brown/managing-award/award-management/effort-reporting-policy>)
- Summer Salary (<https://www.brown.edu/research/conducting-research-brown/managing-award/award-management>)
- Sponsored Travel Policy (<https://www.brown.edu/research/conducting-research-brown/sponsored-travel-policy>)
- Terms and Conditions in Sponsored Research Agreements (<https://www.brown.edu/research/conducting-research-brown/forms-and-policies>)
- Openness in Research (<https://www.brown.edu/research/conducting-research-brown/forms-and-policies>)
- Conflict of Interest in Research (<https://www.brown.edu/research/COIpolicy>)
- Conflict of Interest and Commitment (<https://www.brown.edu/research/coi>)
- Brown University Institutional Animal Care and Use Committee Policy on Principal Investigator (<https://www.brown.edu/research/sites/research/files/Final%20PI%20Requirements%20Policy%20June17.pdf>) Eligibility and Responsibilities (<https://www.brown.edu/research/sites/research/files/Final%20PI%20Requirements%20Policy%20June17.pdf>)
- Brown University Human Research Protection Program Policy and Procedure Manual: Investigators (<https://www.brown.edu/research/sites/research/files/Brown%20Univ%20Pol-Proc%20Manual%20ver.%2001March2022.docx>)
- Patent and Invention Policy (<https://policy.brown.edu/policy/patent-and-invention-policy>)
- Patent and Invention Agreement under External Contracts, Grants and Other Sponsored Agreements (2020) ([https://www.brown.edu/research/sites/research/files/policies/Patent%20%26%20Invention%20Policy%20Acknowledgement\\_FINAL\\_022020.pdf](https://www.brown.edu/research/sites/research/files/policies/Patent%20%26%20Invention%20Policy%20Acknowledgement_FINAL_022020.pdf))

## 7.2 Related Procedures

- Proposal Review and Submission (<https://www.brown.edu/research/conducting-research-brown/preparing-and-submitting-proposal/proposal-review-submission-osp>)
- Change of Principal Investigator and/or Department during an active project (<https://www.brown.edu/research/conducting-research-brown/forms-and-policies>)

## 7.3 Related Forms

- Principal Investigator Eligibility Form (<https://www.brown.edu/research/conducting-research-brown/forms-and-policies>)
- Change of Principal Investigator/Department Form (<https://www.brown.edu/research/conducting-research-brown/forms-and-policies>)

## 7.4 Frequently Asked Questions

- "How Do I" questions on the OVPR Website (<https://www.brown.edu/research/conducting-research-brown/how-do-i>)

## 7.5 Other Related Information

### For federal grants and cooperative agreements:

- 2CFR PART 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (<https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200>)
- The disengagement or change of the Principal Investigator/Project Director (PI/PD). If the approved PI/PD severs his or her connection with the recipient or otherwise relinquishes active direction of the project (either permanently or for a continuous period of more than 3 months or a 25 percent reduction in time devoted to the project) at 2CFR 200.308 Revision of budget and program plans (<https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/section-200.308>)
- PI Effort requirements on federal awards at 2CFR 200.306 (k) (<https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/section-200.306>) Cost sharing or matching

### For federal contracts:

- Part 35 - Research and Development Contracting (<https://www.acquisition.gov/far/part-35>)

## 8.0 Policy Owner and Contact(s)

**8.1 Policy Owner:** Vice President for Research

**8.2 Policy Approved by:** Vice President for Research

**8.3 Contact Information:**

Director, Office of Sponsored Projects  
Email (mailto:Resadmin@brown.edu)  
401-863-2777

## 9.0 Policy History

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

**9.2 Policy Effective Date:** August 22, 2023

**9.3 Policy Update/Review Summary:**

Adds “Professor of the Practice” to automatic PI Eligibility for departments and other units reporting to the Dean of Faculty. Adds Visiting or Visitor faculty titles under 3.1.3, Eligible by Exception Only.  
Previous policy version(s) superseded by this policy:

- Principal Investigator Eligibility for Externally Sponsored Awards, Effective Date: July 28, 2023