

Investigator Eligibility Policy

Office of Sponsored Programs Policy #01.03

Effective Date: 10/01/2012

Revised: 2/21/2018

Authorized by the AVP for Research

Purpose

This policy defines eligibility requirements and responsibilities of principal investigators and co-principal investigators on externally supported (sponsored) projects at the University of Northern Colorado (UNC).

Applicability

This policy applies to all individuals who propose or conduct externally supported projects at UNC.

Definitions

Principal Investigator (PI) or Project Director (PD) – an individual designated by the university to have the appropriate level of authority and responsibility to direct a project or program supported by an external award. A PI/PD participates on the project to a substantial degree and is responsible to UNC for the overall proper management of the project (including fiscal management, compliance, and technical reporting) and the conduct of the project scope of work in compliance with the award terms and conditions and UNC policies and procedures. *For the purposes of this policy document, PI and PD can be used interchangeably with the same meaning.*

Co-Principal Investigator (Co-PI) – an individual involved with the PI in the development or implementation of a sponsored project. A Co-PI devotes a specific percent of his or her effort to the project and is responsible to the university and to the PI for the management and conduct of a specific segment or area of the project in accordance with sponsor requirements, award terms and conditions, and UNC policies and procedures.

Senior Personnel or Key Personnel – individuals whose participation in the conduct of a sponsored project is necessary to the project's success, but who do not share the overall responsibility of a PI or Co-PI. Sponsors typically require these individuals to be named in the proposal/application.

Sponsor - an entity (e.g.: federal agency; state agency; non-profit/foundation; individual, etc.) financing the project (research, or other sponsored project or activity).

Sponsored Project – a specific research, training, service, or similar activity for which funding or other support is provided by a sponsor through an agreement with the university.

Policy

Grants, contracts, and other types of awards that support sponsored projects at UNC are legally binding agreements between sponsors and the university. Although sponsors make awards based on projects proposed by investigators or project directors, the awards are made to the university.

When the university accepts a sponsored project award, it becomes legally responsible and accountable to the sponsor for compliance with terms and conditions of the award and with all applicable laws and regulations. The principal investigator, in turn, is responsible to the university for the overall management and conduct of the project.

To ensure that it can meet its contractual obligations to a sponsor, UNC limits eligibility of PIs and Co-PIs to individuals with appropriately defined affiliations with the university.

Eligibility Categories for Investigator Status

Automatic: PI or Co-PI status is automatically granted to current UNC faculty members in contract-renewable, tenure-track, or tenured positions, and to professional administrative exempt staff in positions of assistant or associate director and higher. Automatic eligibility for PI and Co-PI status terminates upon retirement from UNC. Faculty or staff members nearing retirement must seek an exception, as outlined below, to continue serving as a PI on an existing grant or as a Co-PI on a new proposal or an existing grant.

Conditional: PI or Co-PI status is allowable if every conditional specification/requirement is met and documented with OSP. Conditional status does not require an exception application.

Exception: PI or Co-PI status requires an exception application to the AVP Research for review and approval of the requested investigator status. In all exception applications, the individual’s role must be well justified and contributing significantly to the merit of the project, and must be supported by PI’s unit (Chair/Director) and college (Dean’s office).

Position	Investigator Eligibility		Specifications/Requirements
<i>Current UNC Faculty or Exempt Staff</i>	PI	Co-PI	
○ Faculty members in contract-renewable, tenure-track, or tenured positions	Automatic	Automatic	None
○ Professional/ Administrative exempt staff with title of <i>Assistant Director</i> or above	Automatic	Automatic	None
○ Professional/ Administrative exempt staff with title <i>below</i> Assistant Director	Exception	Conditional	PI: Must apply for exception Co-PI: No application required but Project must include a UNC PI with automatic eligibility (<i>typically employee’s supervisor</i>).
○ Postdoctoral fellow; postdoctoral scholar	Exception	Conditional	PI: Must apply for exception Co-PI: No application required but Project must include a UNC PI with automatic eligibility (<i>typically Postdoc’s faculty mentor/supervisor</i>).

<i>Onboarding UNC Faculty or Exempt Staff</i>	PI	Co-PI	
○ If pending position has automatic eligibility	Conditional	Conditional	No application required. Employee's supervisor (Dean/Director/VP) must confirm employee's contract start date via email to OSP. Anticipated award start date must be <i>after</i> employee start date.
○ If pending position does not have automatic eligibility	Exception	Conditional	PI: Must apply for exception Co-PI: No application required but Project must include a UNC PI with automatic eligibility (<i>typically employee's supervisor</i>).
<i>Current UNC Student</i>	PI	Co-PI	
○ On a student project	Conditional	Conditional	No application required. Student's UNC faculty advisor must have automatic eligibility and is ultimately responsible for the fiscal management and oversight responsibilities for the project conduct.
○ On a faculty project	N/A	Exception	Co-PI: Must apply for exception and project PI must be a UNC faculty member with automatic eligibility (<i>typically the student's faculty advisor</i>).
<i>Other / temporary contracts</i>	PI	Co-PI	
○ Collaborator conducting work at collaborator's institution (e.g. subaward)	N/A	Conditional	An authorized official of collaborator's institution must complete and sign the <i>UNC Subrecipient Commitment & Risk Assessment Form</i> . Project work conducted <i>at UNC</i> must be under the direction of the UNC PI. (<i>Collaborator is responsible for following his/her institution's policy and procedures applicable to investigator eligibility.</i>)
○ Retired or separated from UNC (<i>e.g.: no longer on a faculty contract nor in an exempt staff position</i>)	Exception	Exception	Must apply for exception in all cases, even if employee held PI/Co-PI status on the award pre-retirement. Provost-approved agreement is required, outlining the terms/conditions of post-retirement status and individual's responsibilities to UNC related to the award.

			<i>(PERA recipients advised to contact UNC HR to assess potential impact on retirement benefits if re-employed and/or paid in any manner from grant funds).</i>
○ Visiting, adjunct,, or affiliate faculty conducting work <i>at UNC</i>	N/A	Exception	Co-PI: Must apply for exception and project PI must be a UNC faculty member with automatic eligibility

Other requests for exceptions may be considered on a case-by-case basis.

Requesting Exceptions

Individuals requesting an exception to the *Investigator Eligibility Policy* must complete an **Application for Exceptional PI or Co-PI Status** (available on the Office of Sponsored Programs website), and obtain all necessary approvals before submitting the application to the AVP for Research for approval.

Investigator Status Scope and Restrictions

- If a sponsor’s rules and requirements applicable to PI/Co-PI eligibility are more stringent than UNC’s internal policies/procedures, sponsor’s rules and requirements prevail.
 - Subject to sponsor’s rules and requirements, UNC does not impose restrictions regarding classification of Senior Personnel or Key Personnel who are critical to a sponsored project but not in a PI/Co-PI capacity.
- Once PI and Co-PI exception status is granted, status remains valid for that individual until the individual’s employment status changes or unless status is revoked in writing by the AVP for Research
 - Status may be revoked at the discretion of the AVP for Research (*e.g.: for violation of university policies and procedures; research misconduct; change in university’s risk tolerance; etc.*).
- PI or Co-PI status does not confer UNC faculty status.
- Non-UNC employees from collaborating institutions
 - are not given access to Banner Finance and will not have financial authority to approve grant expenditures at UNC.
 - are not eligible for regular UNC employee benefits, such as sick and vacation leave or medical insurance programs.
 - if supervising any UNC students or employees: required to abide by all university policies and procedures, as well as applicable state and federal laws, regarding employment and supervision.
- Funding opportunity searches and proposal development assistance will be provided by OSP to individuals with automatic PI/Co-PI status, and individuals with PI or Co-PI exception status, as approved by the AVP for Research.

Contact Information

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