NAU NORTHERN ARIZONA UNIVERSITY

POLICY ON PRINCIPAL INVESTIGATOR ELIGIBILITY

Effective Date: August 1, 2011
Revision Date: October 21, 2020

Responsible University Official: Vice President for Research (VPR)
Coordinating Department: Office of Sponsored Projects (OSP)

BACKGROUND AND PURPOSE

When Northern Arizona University (NAU) submits proposals and accepts awards for extramurally funded sponsored projects, the university assumes significant financial and legal obligations. Although sponsors fund projects based on the professional expertise of the Principal Investigators submitting proposals, the formal award is made to the University. Under the general oversight and authority of the University, the Principal Investigator of a sponsored project bears primary responsibility for technical compliance, completion of programmatic work, fiscal stewardship of sponsor funds, and compliance with administrative requirements of the project, including ABOR/NAU policies, award terms and conditions, and applicable laws and regulations. Thus, the University must ensure that individuals serving in the capacity of Principal Investigator have appropriate technical competence and administrative capabilities to carry out the project, and have a reasonably long-term commitment to the University.

This policy is intended to assure that the responsibilities and authority vested in the role of Principal Investigator are reserved for individuals whose qualifications and research have been subject to rigorous review as part of the hiring and tenure process, and whose individual and multi-and/or inter-disciplinary research directions are charted with a view toward advancing knowledge in their fields and their impact on the education of undergraduates, graduate students, postdoctoral fellows, and residents. Individuals whose appointments include public service obligations are held similarly accountable for the direction of outreach and extension activities in order to preserve the public trust.

This policy defines the eligibility requirements for who may serve as a Principal Investigator or Co-Principal Investigator on an extramurally funded sponsored project at Northern Arizona University. This policy also describes the process for requesting and approving exceptions to the eligibility requirements; for example, for faculty with termed appointments who have a proven record of research, training, or service projects.

APPLICABILITY

1. This policy applies to all sponsored projects proposed or conducted at Northern Arizona University.

2. This policy does not apply to procurements, including consultant agreements or the purchase of goods or services from vendors.

POLICY I. DEFINITIONS

Principal Investigator (PI): A principal investigator is a university employee with an eligible appointment who is responsible for conduct of a research, training, or service project supported by extramural funding sources. The principal investigator is the primary researcher and must personally participate in the project to a significant degree (i.e., not a nominal or titular PI).

Co-Principal Investigator (Co-PI): A university employee with an eligible appointment who is responsible for a portion of the design, scientific/technical/administrative conduct, or reporting of a research, training, or service project supported by extramural funding sources.

Project Director: A project director is a university employee with an eligible appointment who is the head of a formally-established training or service project. This title is equivalent to that of a Principal Investigator.

Program Director: A program director is a university employee with an eligible appointment who is the head of a formally-established program involving more than one training or service project and is administratively responsible for all aspects of the program. This title is equivalent to that of a Principal Investigator.

Sponsored Project: An extramurally-supported research, training or public service project related to research or scholarly or professional training to be performed with University resources or facilities, funded through a grant, cooperative agreement, or contract.

Grant: An award for a project conceived and developed by the PI, in which the sponsor has no substantial involvement and support is for a public purpose to support instruction, research, or public service.

Cooperative Agreement: An agreement for a project that is conceived and developed by the sponsor in collaboration with the PI; the sponsor has substantial involvement in the project and the work is conducted by both the sponsor's employees and the PI, generally for a public purpose to support instruction, research, or public service.

Contract: An agreement with specific terms and conditions creating a legal obligation between the parties to do, or not to do, something, and typically providing remedies for breach; the sponsor is seeking to procure a product or service and exercises substantial direction or control in defining the deliverables and deadlines.

II. APPROVAL PROCESS

The Vice President for Research has designated the Assistant Vice President for Sponsored Projects (AVPSP) as the responsible official for approving individuals to serve as a PI or Co-PI. The unit or department Chair/Director and Dean must concur with the request prior to consideration by the AVPSP.

Individuals who are approved to serve as a PI or Co-PI must agree to comply with the Arizona Board of Regents (ABOR) Intellectual Property Policy 6-908.

Requests for approval to serve as a PI or Co-PI may be submitted using the Request for Approval to Serve as PI or Co-PI Form. Approval must be obtained prior to routing a proposal for internal approvals, and a copy of the approval document must be included with the proposal routing package.

Exceptions to the general eligibility criteria, that is, approval to serve as a PI or Co-PI, may be granted (or withdrawn) on a case-by-case basis to individuals with termed appointments or to staff members for projects that relate to their official duties. *A full-time faculty member holding a tenure-eligible position or a non-tenure track research faculty member must be named as a Co-PI, and agree to assume responsibility for the project if the individual leaves prior to completion of the project.*

Approval will be granted on a project-limited basis:

> Project-limited: The individual is granted PI or Co-PI status for only the project under consideration. Authorization is for the term of the grant. The authorization may include a requirement for the proposed project to be peer-reviewed internally prior to submission. The department is responsible for notifying OSP if the individual leaves NAU prior to the end of the grant so that the sponsor can be informed and, if required, approve a new PI to complete the project.

Restricting the approval to a project is intended to assure that each proposed submission is reviewed for its relationship to university research directions/mission.

NOTE: All proposals are subject to the standard internal review process requiring approval from the department chair/unit director, dean, and authorized institutional signatory. The department chair or unit director and dean are responsible for ensuring that the PI and Co-PIs on any proposal submitted to OSP are eligible to serve in that capacity, or that an exception(s) has been granted.

III. PI/Co-PI ELIGIBILE POSITIONS

The following positions are automatically eligible to submit proposals without seeking prior approval:

Full-time faculty members holding tenure-eligible positions or non-tenure track research faculty as defined in the *NAU Conditions of Faculty Service* (COFS) (May 2007, available on the Provost's website) are eligible to serve as a PI or Co-PI on extramurally funded sponsored projects.

Academic appointees who hold the title of Assistant Professor, Associate Professor, Professor, Assistant Research Professor, Associate Research Professor, or Research Professor are automatically eligible to serve as a PI or Co-PI on externally sponsored projects.

Clinical Faculty: Assistant Clinical Professor, Associate Clinical Professor, or Clinical Professor, are automatically eligible to serve as a PI or Co-PI on externally sponsored projects.

Professors of Practice: Assistant Professor of Practice, Associate Professor of Practice, or Professor of Practice, are automatically eligible to serve as a PI or Co-PI on externally sponsored projects.

Directors or Associate Directors of formally organized NAU Institutes or Centers are automatically eligible to serve as PIs or Co-PIs on externally sponsored projects.

Project or Program Directors for formally organized university training or service projects are automatically eligible to serve as PIs or Co-PIs for sponsored projects.

Students or other trainees, including Post-Doctoral Fellows, are automatically eligible to serve as a PI only for fellowship or other training awards that provide stipend support directly to the trainee. These programs typically require that the application be submitted in the student's and/or fellow's name with a faculty member identified as sponsor responsible for the supervision and oversight of the project. The trainee must designate a tenured or tenure track faculty member to serve as a Co-PI who will assume responsibility for compliance with sponsor and institutional

requirements. NOTE: A student or trainee is not ordinarily eligible to serve as a PI for sponsored projects; fellowship and training awards are a   special exemption category.

IV.   POSITIONS REQUIRING PRIOR APPROVAL TO SUBMIT PROPOSALS

The following positions require prior approval to serve as a PI or Co-PI:

<u>Non-tenure eligible faculty positions</u> as defined in the *NAU Conditions of Faculty Service*

(COFS):

a.   Instructor

b.   Lecturers: Lecturer, Senior Lecturer, or Principal Lecturer

c.   Visiting Faculty: Visiting Assistant Professor, Visiting Associate Professor or Visiting Professor

d.   Part-time Faculty

e.   Adjunct Faculty. Since the adjunct faculty position is a non-compensated position, an adjunct faculty member must be appointed to another appropriate rank to receive compensation.

f.   Visiting Scholars. Since the visiting scholar position is a non-compensated position, a visiting scholar must be appointed to another appropriate rank to receive compensation.

V.   OTHER FACULTY AND STAFF

<u>Librarians or Associate Librarians</u> may be approved to serve as PIs or Co-PIs for sponsored projects at the request of the Dean and University Librarian.

<u>Incoming tenure-track faculty or non-tenure track research faculty</u> may be approved to submit proposals prior to their arrival; provided that the individual will be employed by Northern Arizona University at the time the award is issued.

<u>Emeritus Faculty</u> may be approved to serve as PIs or Co-PIs for sponsored projects at the request of departments (see below).

<u>Other requests</u> for persons not included in the above categories will considered on a case-by-case basis.

NOTE: Individuals in the above referenced positions who are *currently* serving as a PI or Co-PI on a sponsored project must be reauthorized under the terms of this PI Eligibility Policy, that is, submit a request for approval to serve (or continue to serve) as a PI or Co-PI.

VI.   CRITERIA FOR APPROVING REQUESTS

Exceptions to the general eligibility requirements will be considered when the following conditions apply:

1.   The individual must have the requisite training, skill, commitment, and expertise necessary to compete for his or her own sponsored program and/or to administer the project. They must have previous experience with similar types of research projects and the ability to comply with all requirements of the award or project.

2. The department/unit commits to provide the necessary laboratory space and/or other resources or support required for the project.

3. The individual is likely to remain at the University for the full term of the grant; or, if Emeritus faculty, continuing a research program or continuing to advise students at NAU.

4. Space and facilities can be arranged without detriment to the regular instructional and research responsibilities of NAU.

5. The individual must complete all applicable NAU-required compliance training prior to proposal submission.

Related Policies: NAU COFS Document

Related Forms: NAU Proposal Approval Form
                 Request for Approval to Serve as a Principal or Co-Principal Investigator Form

Revision Notes: The October 21, 2020 Revision updates Associate Vice President for Sponsored Projects title to Assistant Vice President for Sponsored Projects.

The May, 2018 Revisions removes the prior approval requirement for Clinical Faculty and Professors of Practice to serve as PIs or Co-PIs on proposals submitted to external sponsors. Clinical Faculty and Professors of Practice are automatically eligible to serve as PIs or Co-PIs on proposals submitted to external sponsors.

The August 7, 2017 Revision removes the "Time-Limited" status approval option and content related to this option. It also removes the option to submit a request without use of the standard request form.

The February 12, 2016 Revision designates the AVPSP as the responsible official for the responsibilities approving exceptions to the general eligibility requirements; clarifies the circumstances under which individuals currently serving as a PI or Co-PI must request reauthorization to serve in these roles; and provides a standard form for requesting approval to serve as a PI or Co-PI.

The January 17, 2012 Revision expands the eligible persons category by adding the statement that other requests will be considered on a case-by-case basis.

The March 20, 2014 Revision adds a requirement to comply with ABOR and NAU Intellectual Property policies and changes the designation of responsible official to the Assistant Vice President for Research Administration.

The October 27, 2011 Revision designates the Director of OSP as the responsible official for approving exceptions to the general eligibility requirements; clarifies the circumstances under which individuals currently serving as a PI or Co-PI must request reauthorization to serve in these roles; and provides a standard form for requesting approval to serve as a PI or Co-PI.