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Responsible Chancellor's Cabinet Member: UAF Vice Chancellor for Research

Responsible Department/Office: UAF OGCA

Principal Investigator Eligibility Policy and Exceptions

POLICY STATEMENT

The University of Alaska Fairbanks (UAF) supports and encourages its faculty, staff, and students in their ambitions to pursue external funding to support their research, scholarship, creative, and professional activities. The entrepreneurial activities of UAF faculty and staff in the pursuit of external funds are critical to the research and scholarly missions of the university.

The purpose of this policy is to ensure that individuals who are named as Principal Investigator (PI) or Co-Principal Investigators (Co-PI) on externally sponsored projects have sufficient authority, appropriate background, and acknowledged accountability to carry out all aspects of the project, including assumption of fiscal responsibility. Designation as a project PI confers primary responsibility for the scientific, technical, and fiscal direction of the project to that individual. This designation, once granted to a specific named PI, may not be delegated to any other faculty member or staff member without explicit consent from the funding agency.

When UAF submits proposals to external sponsors and accepts awards for sponsored projects, the university assumes significant financial and legal obligations. Sponsors fund projects based on the professional expertise of the PIs submitting proposals; however, the formal award is made in the name of UAF. Under the general oversight and authority of UAF, the PI of a sponsored project is the individual who bears primary responsibility for technical compliance, completion of programmatic work, fiscal stewardship of sponsor funds, and compliance with the administrative requirements of the project. Thus, UAF must ensure that individuals serving in the capacity of PI have the technical competence and administrative capabilities required to carry out a sponsored project.

PI eligibility must be met at the time of submission and again at the time of award for sponsored projects to be processed appropriately by UAF's Office of Grants and Contracts Administration (OGCA).

ELIGIBILITY

Eligibility to serve as a PI or Co-PI on externally-funded research projects is a privilege generally granted only to members of the UAF faculty, research professionals, and those designated as eligible by this policy. The following are eligible to serve as UAF PIs:

- Tenured, or tenure-track, faculty with a UAF appointment
- Research faculty with a UAF appointment
- Full-time UAF staff in one of the positions listed below:
 - Research Professionals
 - Chancellor, Provost, and Vice Chancellors
- Ph.D. students who have advanced to candidacy have automatic PI status for all external award programs that are targeted for graduate student support (e.g., AHA or ACS fellowships)
- Post-Doctoral Fellows and Scholars have automatic PI status for all external award programs that are targeted for post-doctoral support (e.g., K99, NIH fellowships limited to post docs)

- An official visiting faculty with a UAF faculty sponsor

The definition a PI may vary across different regulatory documents, e.g., Institutional Animal Care and Use Committee (IACUC) or Institutional Review Board (IRB). In these cases, the regulating body (e.g., IACUC, IRB) determines PI eligibility. The individual with the ultimate administrative and fiduciary responsibility of the project, regardless of the title that is actually used, is expected to fulfill the role of PI.

To be explicitly clear, the PI bears primary responsibility for technical compliance, completion of programmatic work, fiscal stewardship of sponsor funds, and compliance with administrative requirements of the project. And to be eligible, people who are in the above categories must not be debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any federal department or agency

EXCEPTIONS

Explicit exceptions can be granted on a case-by-case basis. There may be special situations for which it is acceptable to grant PI-ship to other individuals. Exceptions to the policy may be granted under special circumstances, and a waiver of PI status is required. Exceptions must be approved by the cognizant Dean or Institute Director. For example,

- A UAF researcher who is otherwise not eligible may be approved to serve as PI on externally-funded activities related to the sponsorship of conferences, exhibits, workshops, or public events; specific projects that are part of a larger interdisciplinary program; or career development awards.
- A short-term PI-ship for a visiting faculty member or granting permission for a not-yet-approved faculty member or research professional to submit a proposal.

It may be in the best interest of UAF for individuals who do not have automatic PI status to fulfill the role of PI with respect to a project. In such cases, a Request for PI Exemption may be submitted to the cognizant Dean or Director, so that an individual requesting such status may apply for extramural funding. Examples of circumstances where PI status may be granted include but are not limited to the following:

- (i) Undergraduate and graduate students, administrative staff, and non-faculty research staff may assume the role of PI on pre-doctoral, post-doctoral, or career advancement fellowships or grants that do not involve internal university research protocols.
- (ii) Special-purpose research or thesis grants with specific agencies (e.g., the American Psychoanalytic Association Fund for Research for graduate student thesis research), undergraduate or graduate students, or other research personnel in positions with no PI Status under this policy may be given PI status on the grant application. In those cases, UAF will allow the PI designation as an academic function with the approval of the direct supervisor (the undergraduate teacher/advisor or doctoral mentor) and/or the appropriate cognizant Dean or Director. However, when the associated research requires internal regulatory approvals, the direct supervisor (the undergraduate teacher/advisor, doctoral mentor, or staff supervisor/department chair) will assume the PI responsibility on internal protocols.
- (iii) Administrative staff may serve as PIs on facilities grants, construction grants, administrative grants, infrastructure or other grants with the approval of the relevant cognizant Dean or Director.

- (iv) Other exceptions to this policy can be made and require approval of the appropriate cognizant Dean or Institute Director.

In some cases, a sponsoring agency may have restrictions for who may serve as a PI on a particular project or program that are more stringent than this PI Eligibility policy. In these cases, the sponsor's requirements will take precedence over institutional guidelines for that particular project. In the case where a sponsor may require, allow, or expect an individual to serve as a PI who, under normal UAF guidelines would otherwise not be eligible, the individual will have a tenure track faculty member serve as a Co-PI for internal purposes and assume responsibility for compliance with sponsor and institutional requirements. Fellowships or other training awards are examples where sponsor and institutional requirements may conflict.

An exception to this policy is any application for a student fellowship or other application opportunities where the student is expected or required to be the applicant. Students submitting funding proposals shall:

- fulfill all UAF requirements for new principal investigators prior to proposal submission;
- submit a completed "PI Policy Exemption (PIE) Form" signed by the dean or director of the unit responsible for financial management of the grant if awarded;
- submit the signed "PI Policy Exemption (PIE) Form" with their proposal to the unit appropriate unit business office; and
- once awarded funding, comply with all UAF and sponsor requirements.

Exceptions are granted only on a project by project basis or, in certain unusual cases, for a limited time period. Blanket exceptions are can be granted in truly exceptional cases and need to be approved by the Vice Chancellor for Research (VCR).

PROCEDURES

A request for exception to the Policy must be done through the PI Policy Exemption (PIE) Form. The PIE is to be signed by the proposed PI their cognizant Dean or Director, and when applicable the VCR. All documentation (including any relevant protocols) should be included with this form and emailed to OGCA for coordination of review and approval. The PIE must be received by OGCA no less than five working days prior to the sponsor deadline for submission to an external agency or an internal board.

The request must include a justification as to why the requests should be granted and must document commitment of the unit to provide the appropriate space and resources to the project(s) and/or to the individual requesting PI status. The responsibility to ensure that any extramurally funded projects covered by the request are satisfactorily completed will be assumed by the requesting department and/or school. Appropriate signatories include the cognizant Dean or Institute Director.

The request for PI status may be initiated at the time of appointment of the proposed PI or project director, and approval must be obtained prior to the preparation and submission of the proposal. Since the process of review and approval may take time, the process should be initiated as early as possible. A request for PI status may address one specific proposal or more than one proposal, as appropriate.

Certain sponsors and program guidelines require a graduate student or postdoctoral fellow to act as a PI (e.g., NIH, HRSA) and will be recognized as such in the sponsor's proprietary system, such as NIH eRA Commons.

This is meaningful to the student or postdoctoral fellow because the official sponsor record and award documents will reflect the graduate student or postdoctoral fellow as the project PI. It will show that the graduate student or postdoctoral fellow has agreed to conduct the proposed research as required by program guidelines. In such circumstances, UAF requires approval from the student's faculty advisor or

the fellow's faculty advisor, as applicable, for internal tracking and monitoring purposes. Please note that such faculty advisor must be a member of the graduate student's advisory committee to sign off on the request for PI Status form; and such request must still be signed by the cognizant Dean or Institute Director.

Under these circumstances, OGCA refers to the graduate student or postdoctoral fellow in the University's internal systems as ***PI of Record*** and requires a faculty mentor to shepherd the proposal and award through internal systems. All internal records will reflect the faculty mentor as the primary PI; the faculty mentor PI is ultimately responsible to the University for the technical and fiscal oversight of the project. A formal request for exception is not necessary to be listed as *PI of Record* on internal records.

DEFINITIONS

Principal Investigator (PI)/Project/Program Director (PD): The primary individual responsible for the preparation, conduct, and administration of a research grant, cooperative agreement, training or public service project, contract, or other sponsored project in compliance with applicable laws and regulations and institutional policies governing the conduct of sponsored research. Typically, the term Principal Investigator shall encompass other sponsor-specific titles such as Project Director and Program Director, terms commonly used for non-research sponsored projects.

Co-Principal Investigator/Co-Principal Investigator: Key personnel who have responsibilities similar to that of a PI on research projects, but who play a less prominent leadership role in the overall project, and may report to, or be supervised by, the PI. The PI is ultimately responsible for the conduct of a research project, including ensuring that the project is conducted in compliance with applicable laws and regulations and institutional policies governing the conduct of sponsored research. One significant role of a Co-PI or a Co-PI is to assist the PI in the preparation, conduct, and administration of an award for a sponsored research project.

Sponsored Research Project: A sponsored research project is an activity that is externally funded and includes a formal funding instrument such as a grant, contract, or a cooperative agreement between the university and the sponsor. A sponsored project involves a transaction that includes a specified statement of work and a related, reciprocal transfer of something of value.

RESPONSIBILITIES

Principal Investigator: An individual who has primary responsibility for the design, execution, and management of a research project and who will be involved in the project in a significant manner. The proposed PI requests for an exception to this policy to their cognizant dean/director/unit head with justification and any documentation to support their request.

Project/Program Director: An individual who has primary responsibility for the design, execution, and management of a **training or public service project** and who will be involved in the project in a significant manner. The proposed PD requests for an exception to this policy to their cognizant dean/director/unit head with justification and any documentation to support their request.

Co-Principal Investigator (Co-PI): A designation on a sponsored project application whenever allowed by the sponsor. The Co-PI is a member of the research team who plays a major role in one or more aspects of the project (e.g. conceptual design of the technical aspects of the project, management of the technical implementation, and administration of the project). Moreover, subject to approval by the funding agency, a Co-PI may have to step in and assume the full responsibility of the project in the absence of the PI provided that (a) he/she is automatically eligible for or can be granted PI Status under this policy and (b) whenever he/she is empowered by the PI, or the cognizant dean/director/unit head.

Cognizant Dean or Institute Director: Reviews and approves requests for exceptions to this policy.

Office of Grants and Contracts Administration: Approve all proposal submissions indicating eligible principal investigators, co-principal investigators, or program directors ensuring that all eligibility approvals are properly documented.

NON-COMPLIANCE

Failure to comply with this policy and/or associated procedures may result in missed submission deadlines. Fabrication, falsification, or plagiarism in a funding proposal is considered to be research misconduct and is grounds for disciplinary action by the university and, if applicable, suspension or termination of research, referral for misconduct proceedings, and/or reporting to state and federal regulatory and/or funding agencies. Any disciplinary action taken by the university will follow the employment rules governing the individual's employment category.

Failure to comply with research committee requirements and/or failure to maintain an active protocol will result in suspension of access to sponsored funds, return of funds to sponsor(s) and/or a negative report being sent to the sponsor and/or federal regulatory agencies.

POLICY APPROVED BY:

DocuSigned by:
Mettie La Belle-Hamer
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June 16, 2021

Name
Vice Chancellor for Research
University of Alaska Fairbanks

Date