Principal Investigator Eligibility

I. PURPOSE

This Policy is intended to set forth the eligibility requirements and the duties and responsibilities of a Principal Investigator (PI) at WPI. This Policy also describes the processes for requesting and approving exceptions to the PI eligibility requirements.

II. DEFINITIONS

For the purposes of this Policy, the following definitions shall apply:

Types of **Investigators**:

Principal Investigator (PI) is an employee or affiliate of WPI (normally with an academic appointment) who is or becomes eligible under this Policy to submit a proposal for extramural support for a research, training, or public service project, who personally participates in the project to a significant degree, and who has primary responsibility for the scientific, technical, and administrative conduct, and reporting of the project, including financial matters. A Principal Investigator who is the head of a training or public service project may be known as a Project Director or Project Administrator. For the purposes of this Policy, the terms shall be considered equivalent.

Co-Principal Investigator (Co-PI) is an investigator who will share responsibility for the scientific, technical, and administrative conduct and reporting of a project with the Principal Investigator. Each individual named as a Co-Principal Investigator at WPI must meet the same eligibility requirements as a Principal Investigator. There may be more than one Co-Principal Investigator.

Co-investigator (Co-I) is an investigators who makes a significant contributions, but does not have overall responsibility and authority for the project. They are not considered PD/PIs; they are not the same as Co-PIs.

Multiple Principal Investigator is one of several Principal Investigators who is expected to equally share responsibility for leadership of multidisciplinary and other types of "team science" projects that are not optimally served by the single Principal Investigator model.

III. STATEMENT

A. Eligibility and Administrative Duties

Eligibility to serve as a Principal Investigator, a Co-Principal Investigator (PI) or one of several Multiple Principal Investigators for extramurally supported projects (including receipt of research materials, data, software, etc.) is contingent upon continuation of the employment or other status under which eligibility was initially determined and compliance with all applicable policies of the University and the funding agency. In the event of an apparent conflict between policies of WPI and the funding agency, the more restrictive policy shall be followed. If a PI on an existing project becomes ineligible to serve as PI (e.g. by resigning from employment), then WPI may, at its discretion, appoint a substitute PI or terminate the project.

Most funding agencies recognize only one Principal Investigator. In those instances where several names are listed in the proposal, the agency assumes that the first name listed is *primus inter pares* (first between equals). Whenever the funding agency recognizes only one Principal Investigator, the University will follow suit and direct all administrative correspondence to the first person listed, and that individual shall be identified as Principal Investigator. In the case of National Science Foundation awards, Principal Investigator and Co-Principal Investigator(s) have the same rights and responsibilities.

Additionally, when subawards or subcontracts are anticipated under a proposed project, the Principal Investigator for the subrecipient institution may be named a Co-Principal Investigator on the WPI proposal.

On certain kinds of collaborative research, some funding agencies will recognize Multiple PIs. When this is the case, and in those instances when Multiple PIs are named in a proposal for research support, sponsors require incorporation of a project leadership plan into the proposal. Additionally one of the Multiple PIs must be designated the Contact Principal Investigator (PI). The Contact PI is the person responsible for relaying communications between the investigators and

the funding agency, and for receiving and coordinating all communications with WPI administrative offices and sponsors. The Contact PI is also responsible for ensuring that all internal approvals between administrative offices and the sponsors are procured. The Contact PI will be responsible for identifying those other investigators who should disclose financial interest and all internal financial and personnel matters.

B. Eligible WPI Employees

The following categories of WPI employees are eligible to serve as a Principal Investigator, Co-PI or Multiple PI as specified:

1. Faculty members (all ranks), including research faculty.
2. Directors and Executive Directors, Vice Presidents and Associate/Assistant Vice Presidents, and employees in equivalent positions.
3. Other employees or appointees, including affiliate and visiting faculty, may serve as a Principal Investigator, Co-PI or Multiple PI on an exception basis with the written approval of the appropriate campus official, as noted in III.C.1, below.
4. Graduate students may serve as a Principal Investigator on graduate student fellowship grants. Faculty advisors or mentors will typically be designated as Co-PIs for such graduate student fellowships awarded as grants.
    4.a. For WPI accounting and/or record-keeping purposes, it may be necessary to designate the faculty mentor internally as PI and the student as Co-PI.
5. Postdoctoral Scholars and other trainees may serve as a Principal Investigator on research training and mentored training grants intended to enhance their professional skills and to prepare them for research independence. Faculty advisors or mentors will typically be designated as Co-PIs on such grants. Except for career transitions awards, those programs specifically designed to bridge postdoctoral training and the earliest stages of a faculty appointment, the duration of a proposed grant should not exceed the period of the traineeship.
    5.a. For WPI accounting and/or record-keeping purposes, it may be necessary to designate the faculty mentor internally as PI and the post-doc as Co-PI.

C. Exceptions

Exceptions to the eligibility requirements for submitting a contract proposal or a grant application may be granted as outlined below. It is important that an individual who serves as a PI, Co-PI or Multiple PI by exception is aware of WPI and sponsor policies. The academic unit in which these individuals will conduct research or other sponsored activities must provide space and access to other research facilities through the term of the contract or grant.

1. Authority to Approve Exceptions

   The campus official with administrative responsibility for the unit that will administer the award may approve, by exception, the submission of a contract or grant proposal by appointees in positions other than those noted above in section III.B. This is typically the department head for academic personnel and the Vice Provost for Research for all others.

2. Requests for Exception

   Exceptions to the general eligibility requirements will be considered upon submission of a written request to the appropriate campus official noted in C.1, above. The written request must justify the exception in terms of the following criteria:

   - That such action is clearly in the best interests of WPI;
   - That space and facilities can be arranged without detriment to the regular instructional and research responsibilities of WPI; and
   - That is clearly able to carry out the responsibilities incumbent upon a Principal Investigator.

   Upon approval, a copy of the request signed by the department head or VPR shall accompany the Notice of Intent to Submit a Proposal when it is submitted to the Office of Sponsored Programs.