Investigator Eligibility Policy
Office of Sponsored Programs Policy #01.03
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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. PIs/PDs must be tenured or tenure-track faculty, contract-renewable faculty with a contracted obligation or expectation of scholarship that includes seeking external funding, or exempt staff. Retired faculty or staff can serve as PI provided that a fully approved and currently active Research Fellow appointment is on file. *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. "Co-PI" is not interchangeable with "Co-I". Co-PIs must be tenured or tenure-track faculty or contract-renewable faculty with a contracted obligation or expectation of scholarship that includes seeking external funding. Contract renewable faculty without a contracted obligation for scholarship may be Co-PI with the approval of their unit leader and Dean provided that the other Co-PI is tenured or tenure-track faculty. Exempt staff may also be Co-PI Retired faculty or staff can serve as Co-PI provided that a fully approved and currently active Research Fellow appointment is on file.

Co-Investigator (Co-I) – an individual who is involved with the PI in the project's scientific development or execution but does not rise to the level of being a full PI. Co-investigators do not have overall responsibility and authority for the project. Co-investigators should be listed as senior/key personnel. "Co-I" is not interchangeable with "Co-PI". Contract renewable faculty with contractual obligation or expectation of scholarship that includes seeking external funding may be Co-I. Contract renewable faculty without a contracted obligation for scholarship may be Co-I with the approval of their unit leader and Dean.

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 or Award – 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. The university, through ORSP, is responsible for ensuring that all personnel and activities associated with an award comply with all policies and procedures applicable to the award.

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 (A): PI or Co-PI status is automatically granted to current UNC faculty members in tenure-track, tenured positions, contract-renewable faculty with a contractual obligation or expectation of scholarship that includes seeking external funding, 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 request Faculty Research Fellow Status through their dean to continue serving as a PI on an existing grant or as a Co-PI on a new proposal or an existing grant. Requests for Faculty Research Fellow Status should be submitted to the Associate VP for Research by the Dean three (3) months prior to retirement.

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

Exception (E): 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
Current UNC Faculty or Exempt Staff	PI	Co-PI	Co-I	
o Faculty members (Tenure, tenure-track)	A	A	A	None
o Faculty members (contact renewable with a contracted expectation of scholarly activity	A	A	A	None
o Faculty members (contract renewable **without** an expectation of scholarly activity	E	E	E	Approval of unit leader and Dean
o Professional/ Administrative exempt staff with title of *Assistant Director* or above	A	A	A	None
o Professional/ Administrative exempt staff with title *below* Assistant Director	E	C	C	PI: Must apply for exception Co-PI or Co-I: No application required; Project must include a UNC PI with automatic eligibility and approval of their direct supervisor.
o Postdoctoral fellow; postdoctoral scholar	E	C	C	PI: Must apply for exception; must be required by sponsor. Must be a post-doctoral fellow/scholar at UNC for the duration of the award or seek a change in status. Co-PI: No application required; Project must include a UNC PI with automatic eligibility (*typically Postdoc's faculty mentor/supervisor*). Must be a post-doctoral fellow/scholar at UNC for the duration of the award or seek a change in status.

Position	Investigator Eligibility			Specifications/Requirements
Onboarding UNC Faculty or Exempt Staff	PI	Co-PI	Co-I	
o If pending position has automatic eligibility	C	C	C	No application required. Employee's supervisor (Dean/Director/VP) must confirm employee's contract start date via email to ORSP. Anticipated award start date must be *after* employee start date.
o If pending position does not have automatic eligibility	E	C	C	PI: Must apply for exception Co-PI: No application required; Project must include a UNC PI with automatic eligibility (*typically employee's supervisor*).
Current UNC Student	PI	Co-PI	Co-I	
o On a **student** project	C	C	C	No application required. Must be required by sponsor; Student's UNC faculty advisor must have automatic eligibility and is ultimately responsible for the fiscal management and oversight responsibilities for the project conduct. If funds are received by the university, students must be enrolled for credit for the duration of the project.
o On a **faculty** project	N/A	E	E	Co-PI, Co-I: Must apply for exception and project PI must be a UNC faculty member with automatic eligibility (*typically the student's faculty advisor*). Students must be enrolled for credit for the duration of the project or seek an update to their PI status.

Position	Investigator Eligibility			Specifications/Requirements
Other / temporary contracts				
○ Collaborator conducting work at collaborator's institution (e.g. subaward)	N/A	C	C	An authorized official of collaborator's institution must complete and sign the UNC *Subrecipient Commitment & Risk Assessment Form.* Project work conducted *at UNC* must be under the direction of the UNC PI. *(Collaborator is responsible for following his/her institution's policy and procedures applicable to investigator eligibility.)*
○ Retired faculty or staff	C	C	C	Provost-approved agreement is required, outlining the terms/conditions of post-retirement status and individual's responsibilities to UNC related to the award. *(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).*
○ Visiting, adjunct, or affiliate faculty conducting work *at UNC*	N/A	E	E	Co-PI: Must apply for exception and project PI must be a UNC faculty member with automatic eligibility; status will terminate upon separation from UNC.

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 <u>not</u> given access to Banner Finance and will not have financial authority to approve grant expenditures at UNC.

    - are <u>not</u> 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 ORSP 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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