

Protocol for Principal Investigator Eligibility in Association with Externally Funded Research, Service, and Programs

I. Introduction

A. General Protocol

University of San Diego assumes significant financial and legal obligations when a proposal to an external sponsor is submitted, because any award made as a result of the proposal will be in the name of the university. Under the general oversight and authority of the university, the lead principal investigator (also project administrator, project director, program administrator, and program director) of a sponsored project is the individual who bears primary responsibility for completion and technical compliance of the proposed scope of work, fiscal stewardship of the sponsor funds, and fulfillment of the administrative requirements of the project. Thus, the university must ensure that individuals serving in the capacity of lead principal investigator have appropriate technical competence, administrative capabilities, and a reasonable long-term commitment to the university. This protocol defines the requirements that must be met by those who serve in the capacity of lead principal investigator or co-principal investigator on externally sponsored projects at University of San Diego.

B. Scope

This policy is intended to carry out this institution's responsibilities under the Code of Federal Regulations Title 2, Subtitle A, Chapter II, Part 200 Uniform Administrative requirements, Cost Principles, and Audit Requirements for Federal Awards.

II. Definitions

- A. *Lead Principal Investigator (PI)* – A lead principal investigator is a university employee with an eligible appointment (see section III below for eligible appointments) who is responsible for the design, scientific/technical/administrative conduct, and reporting of a research, training, or service project supported by extramural funding sources. A lead principal investigator must personally participate in the project to a significant degree.
- B. *Co-Principal Investigator (Co-PI)* - A co-principal investigator is a university employee who participates in the project and contributes substantively to the design, scientific/technical/administrative conduct, and reporting of a research, training, or service project supported by extramural funding sources.

EQUIVALENCE OF TERMINOLOGY

Some external sponsors may use titles including Project Administrator, Project Director, Program Administrator, and Program Director in place of Lead Principal Investigator as defined above. All statements in sections III and IV for a Lead Principal Investigator would similarly apply to all titles indicating the individual who bears primary responsibility for completion and technical compliance of the proposed scope of work, fiscal stewardship of the sponsor funds, and fulfillment of the administrative requirements of the project.

III. Eligibility

- A. **Lead Principal Investigator:** Any individual who holds one of the following appointments at the university may be a principal investigator for an externally sponsored project:
- 1) Tenured and tenure-track faculty member;
 - 2) Administrator who has been approved by the Office of the Senior Vice President and Provost representative;
 - 3) Research faculty or clinical faculty member with an appointment until at least the end of the proposed grant;
 - 4) Director of a formally approved institute or center at the university;
 - 5) Formally-named Professors of Practice with an appointment until at least the end of the proposed grant.
- B. **Co-Principal Investigator:** Any individual who holds one of the following appointments at the university may be a co-principal investigator for an externally sponsored project with a fully eligible USD PI:
- 1) All eligible Lead PIs as defined above;
 - 2) Adjunct Faculty or similar position whose appointment term corresponds with their work on the project;
 - 3) Employees whose appointments are primarily dedicated to a research center on campus or who were hired with the intent of acting as Co-PI on a specific project;
 - 4) USD Research Associates formally appointed by the Office of the Senior Vice President and Provost. The dean with whom the individual appointment is associated, must submit a request to the Associate Provost for Research Administration well in advance of the grant proposal submission deadline. The letter should clearly express the dean's support of the research associate in the Co-PI role, intention to request their appointment term extension to at least the end of the grant period should the proposal be funded, and commitment to find a suitable replacement if the research associate is no longer able to fulfill their commitment and responsibilities to the funded grant;
 - 5) Postdocs with their faculty advisor, who is a fully eligible USD PI, listed as lead PI of the project;
 - 6) Graduate and/or PhD students who have been approved by their thesis advisor and Dean.

IV. Conflicts with Sponsors

In some cases, a sponsoring agency may have more stringent restrictions on the qualifications for a lead principal investigator or co-principal investigator on a particular project than are mandated by university policy. In this situation, the sponsor's restrictions will take precedence over the policies of the university for that particular project.