**PURPOSE:**

To determine the minimum qualifications, and normal responsibilities of Principal Investigators for Sponsored Programs beyond those imposed by the Sponsor. These qualifications include, but are not limited to, employment by the University or Auxiliary.

**BACKGROUND:**

Revision

**POLICY: Accountability:**

Provost/Vice President for Academic Affairs and Other VPs with sponsored projects, Research and Sponsored Programs

**Applicability:**

All eligible CSU Channel Islands (CI) faculty and staff as identified below

**Definition(s):**

**Sponsored program:** A sponsored program is a grant, contract, or cooperative agreement between the University and an entity external to the University, call the “sponsor.” The sponsored program has expected outcomes and may or may not provide sponsor funds to the University.

**Principal Investigator:** For the purposes of this policy, “Principal Investigator” is the individual designated in a sponsored program to be responsible for ensuring compliance with the academic, scientific, technical, financial, regulatory and administrative aspects as well as day-to-day management and programmatic reporting. Depending on the nature of the grant/ contract and the funding agency, the Principal Investigator may carry a different title in the contract or grant. While the day-to-day management of a project may be delegated to an individual other than the Principal Investigator, the Principal Investigator is still responsible for oversight of the project and ensuring that the grant work is conducted consistent with the funded proposal, budget and sponsor regulations. Some sponsors may use other terminology for the Principal Investigator role (*e.g.*, Project Director).

**Text:**

*Principal Investigator Eligibility:*

Tenured and full-time probationary tenure-track faculty, and university administrators (MPP) are authorized to participate as Principal Investigators of externally-funded research and sponsored programs. Other individuals must be approved by the relevant Vice President in accordance with the established criteria for the appointment of an individual to Provisional Principal Investigator status (see below). All Principal Investigators must be willing and able to work with the Research and Sponsored Programs Office, Finance and Administration, and CI Foundation/Advancement staff (if appropriate) to ensure adherence to CI, CI Foundation (as applicable), CSU, and sponsor policies, procedures and regulations.

*Criteria for the Appointment of an Individual to Provisional Principal Investigator Status:*

In most cases Provisional PI status is determined on the basis of employment, and all require approval of the relevant division Vice President. A Principal Investigator must be an employee of CI with exception of the following cases:

1) Emeritus faculty,

2) Individuals within CI’s volunteer status (Non-employee) who meet very specific qualifications and funder criteria.

Lecturer faculty and other staff members may also be appointed to Provisional Principal Investigator status with written approval from the relevant Vice President, and with agreement to abide by all the responsibilities that PI status requires.

*Eligibility for Continuance of Provisional Principal Investigator Status:*

Emeritus faculty, lecturer faculty, and others granted Provisional Principal Investigator status will undergo a formal review for continuation as a Principal Investigator. The requirements for this will be specified in the terms of Principal Investigator appointment. Continuation will be dependent on demonstrated competence in meeting program objectives, managing external funding, and adherence to CI, CSU, and sponsor policies, procedures and regulations. The review will be conducted by the Provost (or appropriate Division Vice President) in consultation with Research and Sponsored Programs and Financial Affairs post-award staff.

*Principal Investigator Roles and Responsibilities:*

The Principal Investigator (PI) is responsible for the development of proposals in compliance with CSU, CI, CI Foundation (if applicable) and funding agency policies, procedures and requirements, including development of proposal budgets to include only costs that are reasonable, allowable and allocable. The Principal Investigator has the dual responsibility for complying with the financial and administrative policies of the award while achieving the goals and objectives of the project. Principal Investigators are responsible for working with the Research and Sponsored Programs Office and Advancement staff (if applicable) on proposal submissions and adhering to CI’s Proposal Administrative Review (PAR) Process. Principal Investigators are not authorized to accept a grant. Grants are awarded to the University or the CSU Channel Islands Foundation, not the Principal Investigator, and the University and Auxiliary are the only entities authorized to accept a grant.

Principal Investigators operate under the supervision of their Program Chair and Dean/Associate Vice President or other administrative unit supervisor. It is the Principal Investigator’s duty to continuously exercise responsible judgment in the administration of the project and effectively train and supervise project staff. Although Principal Investigator’s may have administrative staff to assist in the management of sponsored projects, the ultimate responsibility for the successful completion of the scope of work and the management of funds rests with Principal Investigators.

In addition to completing the scope of work as prescribed in the funded proposal, Principal Investigators must:

1. Serve as the project manager for the sponsored project or, in the event that the sponsored project provides funds to hire a dedicated project manager, supervise the project manager.
2. Initiate, execute and manage expenditures on award funds.
3. Track the budget for the sponsored program and meet annually with Finance and Administration (and/or CI Foundation if the sponsored program was awarded to the Foundation) for budgetary review and project status. Meetings may include RSP to review potential need for no-cost extension or budget modifications.
4. Ensure that expenditures on award funds are allowable and do not exceed the approved budget. Ensure that budget modifications are made when necessary and obtain prior approval of the sponsor, when required.
5. Comply with sponsor, CI, CI Foundation (if applicable) and CSU policies, procedures, rules and regulations during the day-to-day operation of the project and when making any changes to the scope of work or funded budget.
6. Be responsible for ensuring Responsible Conduct of Research (RCR) training for all sponsored projects requiring RCR training for grantees when required by the sponsored or CSU policy.
7. Disclose any potential conflicts of interest at the time of application and/or if one arises during the life of the project when required by the sponsor and CSU policy.
8. Submit required progress/technical reports to the funding agency on or before the report due date.
9. Provide a copy of progress/technical reports and correspondence (such as budget modifications, changes in key personnel including PI, major changes to the scope of work or project deliverables, progress/technical report deadline extensions) with the funding agency to RSP (or CI Foundation if the sponsored program was awarded to the Foundation).
10. Comply with applicable sponsor rules and regulations during the day-to-day operation of the project and when making any changes to the scope of work or funded budget.

 Failure to comply with responsibilities may result in restrictions that may include, but are not limited to, limiting a Principal Investigator’s ability to spend sponsored project funds or restrictions on the employee’s privilege to act as a Principal Investigator for future sponsored projects.

*Transfer or Replacement of PI:*

Financial Affairs and RSP (or Advancement staff, if the sponsored program was awarded to the CI Foundation) are jointly responsible for assessing and negotiating all transfers of sponsored projects to another institution, and/or the transfer of equipment purchased with sponsor funds to another institution. A representative from Financial Affairs and the designated Sponsored Program Administrator are the only authorized university officials to directly negotiate with the sponsor.

Satisfactory progress on individual grants and contracts is determined by the sponsor on a project-by-project basis. Any issues and/or concerns with the performance of a Principal Investigator regarding adherence to university, sponsor or federal policies and procedures will be initially addressed with the Principal Investigator by Research and Sponsored Programs Administration, Financial Affairs and/or Human Resources depending on the issue. If the Principal Investigator is non-responsive or if the response does not result in corrective action and future adherence to university policies and procedures, the situation will then be referred to the respective Program Chair, Dean/AVP and/or the Provost (or appropriate division Vice President) as necessary for assistance and resolution.

The Principal Investigator is responsible for the timely submission of written notification to the Provost (or appropriate division Vice President) and the Research and Sponsored Programs Office when requesting a change of Principal Investigator status voluntarily on a sponsored project. Voluntary transfer or replacement occurs when a Principal Investigator intends to leave the institution willfully, retires, or is unable to continue performing work on a sponsored project. Faculty taking sabbatical who wish to continue to work on a sponsored program must receive written approval from the President (through a request submitted to Faculty Affairs).

Involuntary transfer or replacement of a Principal Investigator occurs when the PI refuses to continue performing work on a sponsored project, is not in good standing with their sponsor or the university (*e.g.,* under temporary suspension or disciplinary action) , or is not eligible to serve as the Principal Investigator due to a change in employment status with the university. In the case of a temporary suspension, if the PI is returned to duty, he or she will also be restored to Principal Investigator status.

When the replacement of a Principal Investigator is involuntary, it is the responsibility of the Provost (or appropriate division Vice President) for the timely submission of written notification to the Principal Investigator, Research and Sponsored Programs, Dean/AVP, and Program Chair stating why the PI is not in good standing with a funder or the university. In all cases, when a Principal Investigator is involuntarily removed from a sponsored project they may not apply for additional grants or contracts until they are in good standing with the university.

Whether the transfer or replacement of a Principal Investigator is voluntary or involuntary it is the responsibility of the Provost (or appropriate division Vice President) to notify Research and Sponsored Programs to ensure that work on the grant continues until a new Principal Investigator has been appointed in accordance with the funding agency’s policies.

*Distribution of responsibilities among Principal Investigators on Multi-Institutional*

*Sponsored programs***:**

Some sponsored program activities require collaboration between more than one institutions. In such cases, the responsibilities of all participating institutions and Principal Investigators shall be defined in written agreements signed by the institutions' respective authorized agents. Representative examples of acceptable agreement instruments include subawards, subcontracts and memoranda of understanding (MOU). All such agreements shall stipulate that all parties will adhere to appropriate institutional policies governing sponsored programs administration and any specific sponsor requirements. Multi- Institutional sponsored programs must adhere to the Proposal Administrative Review (PAR) process administered by RSP.

Principal Investigators proposing Multi-Institutional Sponsored Programs shall ensure receipt of completed and authorized proposals from proposed subrecipients for inclusion in the proposal prior to submission.