

**NOVA SOUTHEASTERN UNIVERSITY
OFFICE OF SPONSORED PROGRAMS
POLICIES AND PROCEDURES**

PROPOSAL PREPARATION

PRINCIPAL INVESTIGATOR ELIGIBILITY

EFFECTIVE 07/17/2017

POLICY #3.1

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PURPOSE:

This policy establishes eligibility criteria for individuals serving as Principal Investigators (PIs) and Project Directors (PDs) on externally funded sponsored projects at Nova Southeastern University. Since extramural proposals and funding obligate the university in many ways, it is incumbent on the university to ensure that PIs and PDs are capable of carrying out sponsored projects and fulfilling the programmatic, administrative, fiscal and compliance requirements of their awards.

DEFINITIONS:

Principal Investigator (PI): The individual whom the university designates to direct the scientific, technical, or programmatic aspects of a sponsored program, project, or activity. The PI is responsible and accountable to the university and the sponsor for the proper conduct of the project or activity. In addition to accepting the overall responsibility for directing the research or program activities, the PI also accepts primary responsibility for financial oversight of the award and for compliance with relevant university policies, federal regulations, and sponsor terms and conditions. For the purpose of this policy, Project Director is a title synonymous with PI for a non-research sponsored program.

Co-Principal Investigator (Co-PI): An individual that shares equal authority and responsibility for leading and directing a research project that is responsible and accountable to the university and the sponsor for the proper conduct of the project or program. The presence of more than one Co-PI does not diminish the accountability or responsibility of another Co-PI on the project.

Co-Investigator (Co-I): An individual involved with the PI/PD in the scientific development or execution of a project. A Co-Investigator does not share equal authority and responsibility for leading and directing a project as the PI/PD. The standards of this policy do not apply to the role of Co-Investigator.

Sponsored Project/Program: Any externally funded research, service or training activity that has a defined scope of work or set of objectives which provides a basis for sponsor requirements or expectations.

POLICY:

Full-time faculty members, deans, full-time research scientists and associate research scientists, and full-time administrators with faculty rank may routinely serve as PIs/Co-PIs on externally funded sponsored programs.

Other individuals meeting certain special conditions are also authorized to serve as PIs, within the limitations set forth below and as permissible by the sponsor:

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Postdoctoral Scholars/Fellows or Graduate Students: Certain sponsored programs are designed to support postdoctoral or graduate education or research through education/training projects such as doctoral dissertations, pre/postdoctoral fellowships, or career development awards whose purpose is scientific career advancement. For these types of programs:

- A full-time faculty member must serve as Faculty Advisor/Mentor.
- The applicant may be named in the proposal (without an approved exception) as PI *if expected* by the sponsor. The applicant shall be responsible for the intellectual work, and the university will internally designate the Faculty Advisor/Mentor as responsible for oversight and proper conduct of the project.

Professional staff: Full-time NSU professional staff (i.e., Librarians, Art Museum staff, Mailman Segal Center staff, etc.) may serve as a PI/Co-PI with documented written approval of their Vice President, if from an administrative unit, or Dean, if from an academic unit. Eligibility should be limited to projects related to the individual's official duties and expertise, as specified in the appointment/job description. Such approval is granted via the Proposal Approval Record.

Pending appointments: Individuals who are not full-time faculty members at the time of proposal submission, but who will be appointed prior to the award, may apply as a PI, if an offer letter has been accepted by the individual being hired and a start date has been established, subject to verification by the College/Department HR Contact, or with written approval by the Dean or equivalent. If the individual subsequently does not accept the NSU position, the University has the option of naming a replacement or returning the award to the sponsor.

Individuals not covered by the above may request approval to serve as a PI. Adjuncts and temporary employees generally may not serve in the PI role; NSU faculty who have been given adjunct appointments as part of their transition to a new institution can retain PI status on grants remaining at NSU, subject to approval of the Dean and the sponsor. Visiting and Emeritus Faculty/Visiting Scientists may be approved to serve as a PI/Co-PI, in accordance with the procedures below. In rare circumstances, individuals who do not have employment status at NSU may be approved to serve as a PI and must sign a written agreement indicating the terms of the collaboration, including requirements to comply with all applicable laws, regulations and NSU policies and procedures.

PROCEDURES:

Individuals who are routinely eligible in accordance with this policy may serve as PI/Co-PIs on externally funded projects and transmit proposals for review, authorization and submission in accordance with established policies and procedures.

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Individuals not designated as eligible under this policy must request an exception by completing a *PI/PD Eligibility Approval Request* form, which will be signed by the Department Chair and College/Center Dean or equivalent, and approved by the Senior Vice President for Translational Research and Economic Development (or the Vice President for Research and Technology Transfer). The approval may be requested on a per-project basis, or for all projects over a period of time. In order to be considered, the request must meet the following conditions (meeting all conditions does not guarantee approval):

- The individual must have the necessary competency, experience and independence to compete for his/her own sponsored projects and to administer the project, if funded. This determination will be made by Department Chair and the College/Center Dean or equivalent.
- The individual must obtain written commitments from the Department Chair/Dean or equivalent to guarantee necessary lab space or other resources or support needed to conduct the project(s).
- The Department Chair/Dean or equivalent must identify an alternate faculty member with appropriate experience that can assume responsibility if the designated PI/PD leaves the university or becomes unable to complete the sponsored project(s).
- The [PI/PD Eligibility Approval Request form](#) must be received in the Office of Sponsored Programs (OSP) prior to proposal deadline, within sufficient time to allow for review, and thereby avoid an individual investing significant time in proposal preparation, and subsequently not being deemed eligible to serve as a PI/Co-PI.

Individuals granted approval to serve as PI/Co-PIs under this policy must transmit proposals for review, authorization and submission in accordance with established policies and procedures of the university.

REFERENCES:

OSP Policy #7 - Proposal Review, Approval, Signature and Submission on Behalf of NSU

OSP Policy #18 - Responsibilities of Principal Investigators and NSU for Sponsored Agreements

Division of Responsibilities on Sponsored Projects

PI/PD Eligibility Approval Request Form