



Principal Investigator Eligibility for Sponsored Programs

Policy Type: Administrative

Responsible Office: Office of Sponsored Programs, Office of the Vice President for Research and Innovation

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Policy Statement and Purpose

This policy defines who is permitted to serve as a principal investigator (PI) for sponsored programs. Detailed responsibilities for PIs are identified in the Roles and Responsibilities Matrix found in the Related Documents section of this policy. All PIs must complete any mandatory training requirements prior to beginning their research.

Noncompliance with this policy may result in disciplinary action up to and including termination. VCU supports an environment free from retaliation. Retaliation against any employee who brings forth good faith concerns, asks a clarifying question, or participates in an investigation is prohibited.

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Who Should Know This Policy

All individuals involved in sponsored programs are responsible for knowing this policy and familiarizing themselves with its contents and provisions.

Definitions

Active Dual Appointment

An appointment in which the individual holds one of the following paid appointments in addition to their paid VCU appointment:

Hunter Holmes McGuire Veterans Affairs Medical Center (VAMC)
MCV Practice Plan (MCVP)

Administrative and Professional (A&P) Faculty

Administrative Faculty – Administrative faculty appointments require the performance of work directly related to the management of the education and general activities of the institution, department or subdivision thereof. Incumbents in these positions exercise discretion and independent judgment and generally direct the work of others. The organization reporting relationship normally must go no lower than three levels below the President.

Professional Faculty – Professional faculty appointments require advanced learning and experience acquired by prolonged formal instruction and/or specialized work experience. This category is normally limited to librarians, counselors, coaches, lawyers, physicians, dentists, veterinarians and other professional positions serving education, research, athletic, medical, student affairs, and development functions or activities.

Intergovernmental Personnel Act Agreement

An agreement between VCU and the federal government allowing for temporary assignment of federal government personnel to VCU (or vice versa).

Predoctoral Trainee, Postdoctoral Scholar, or Postdoctoral Trainee

A predoctoral or postdoctoral individual supported by an extramurally funded fellowship or traineeship for mentored training. Trainees receive a stipend to pursue an individually defined training program and are paid through a university account but not through the university payroll system.

Principal Investigator

The principal investigator of a sponsored program is the individual with overall responsibility for the conduct of research or other activity described in a proposal or an award, and/or the individual with fiduciary responsibility for an award's management.

Teaching and Research (T&R) Faculty

Employees in teaching and research faculty (T&R faculty) positions have principal and regularly assigned responsibilities that include a significant commitment to teaching that includes the development and delivery of the university curriculum for students enrolled at VCU and/or a significant commitment to original

research and scholarship that includes the creation, dissemination and application of new knowledge and/or artistic expression. T&R faculty positions:

- Are generally full-time appointments to a faculty position with academic rank made under the ultimate authority and with the final approval of the board of visitors
- Are the employee's primary appointment
- Involve principal and regularly assigned duties and responsibilities of teaching, research, scholarship or creative activity that represents the majority of the contractual time
- Are subject to the criteria and expectations for promotion and/or tenure under the university's *Faculty Promotion and Tenure Policies and Procedures*
- Are either tenured, probationary (tenure-eligible), term (non-tenured) or adjunct (non-tenured). Other faculty appointments include clinical, faculty affiliate, emeritus/emerita, eminent scholar and visiting faculty.

Term Faculty

Term faculty appointments are generally full-time appointments for a specified term and do not lead to tenure. Term faculty members hold the same basic benefits and rights and responsibilities as tenured or tenure-eligible faculty in accordance with the university's *Academic Rights and Responsibilities* policy except that they shall not be afforded tenure or tenure eligibility.

Term faculty may be employed to work on a specific project or series of projects that may involve teaching, research, or service or some combination of these activities. Employment of faculty in project-related positions is limited by the funds available and prior notice of termination or non-renewal varies according to the job category. Term faculty supported by restricted funds may be subject to different terms of notification of non-renewal that shall be specified in the letter of appointment in accordance with VCU's *Faculty Promotion and Tenure Policies and Procedures* policy.

Term faculty are appointed at the rank of professor, associate professor, assistant professor or instructor. A term appointment may be for a term of one to five years and is renewable.

University and Academic Professional

Employees who support the mission of the university in non-faculty roles. This group includes salaried employees hired after July 1, 2016; those classified staff who have elected to participate in this employee group; and those who were formerly administrative and professional faculty.

Contacts

The Office of Sponsored Programs officially interprets this policy. The Office of Sponsored Programs is responsible for obtaining approval for any revisions as required by the policy *Creating and Maintaining Policies and Procedures* through the appropriate governance structures. Please direct policy questions to the associate vice president for sponsored programs.

Policy Specifics and Procedures

I. INDIVIDUALS ELIGIBLE TO SERVE AS PRINCIPAL INVESTIGATOR FOR SPONSORED PROGRAMS

VCU requires that the named PI for a sponsored program be classified by VCU as a full-time employee (or less than full time as defined below), meet the minimum eligibility requirements defined by the sponsoring agency, and meet the following eligibility guidelines.

Any individual who holds one of the following positions on a full-time basis (unless otherwise specified), or has accepted, in writing, an offer of full-time employment, can be identified as a PI for a sponsored program and submit proposals to external sponsors. This may include:

- President
- Provost
- Vice president
- Teaching and research faculty
- Term (non-tenure track) faculty
- Administrative and professional faculty (through 6/30/2018)
- University and academic professional (with the support of their chair and dean OR divisional head when there is not an academic home)
- Predoctoral trainee, postdoctoral scholar, or postdoctoral trainee on a training or fellowship opportunity when required by the sponsor
- Teaching and research faculty (who hold a paid VCU appointment that is less than full time) with an active dual appointment

II. PROCEDURES FOR REQUESTING AN EXCEPTION

Individuals serving as PI must be listed on all appropriate documents for the particular sponsored program.

Individuals who are not eligible to serve as PI may apply for an exception under this policy.

Approval of the vice president for research and innovation (or designee) is required for all exceptions prior to proposal submission. In all cases, the VCU PI of a sponsored program must hold a paid VCU appointment.

The following represents a list of potential situations when an exception may be granted. Inclusion in this list does not imply automatic approval of an exception request. All exceptions will be evaluated on a case-by-case basis.

1. A VCU Health System resident, also sometimes referred to as “house staff,” is permitted to serve as PI for a sponsored program when required by the sponsor. However, a VCU faculty mentor must serve as an internal PI for project management purposes.
2. A full-time VCU Health System employee who, upon award, will be granted a paid VCU appointment (*i.e.*, adjunct position).

3. A full-time VAMC employee who, upon award, will be either granted a paid VCU appointment (*i.e.*, adjunct position) or temporarily assigned to VCU under an Intergovernmental Personnel Act (IPA) Agreement.

Requests for an exception must be made for a specific project and for a specified period of time.

In determining whether to grant an exception, the vice president for research and innovation (or designee) considers several factors, including but not limited to the following:

1. Commitment of proposed PI to project timeline and project administration
2. Academic quality of proposal
3. Qualifications of proposed PI
4. Relevance and importance of proposal to other university interests

The vice president for research and innovation (or designee), in their sole discretion, makes the final decision on approval of PI eligibility exception requests.

To apply for a PI eligibility exception for sponsored programs, the individual must complete and submit the Sponsored Program PI Eligibility Exception Form [via RAMS-SPOT \(https://spot.research.vcu.edu\)](https://spot.research.vcu.edu). For the form, see the Forms section of this policy.

III. INDIVIDUALS ELIGIBLE TO SERVE AS PRINCIPAL INVESTIGATORS FOR HUMAN SUBJECT RESEARCH OR ANIMAL RESEARCH PROTOCOLS

Human subject research is governed by VCU's Institutional Review Board (IRB). Animal research is governed by VCU's Institutional Animal Care and Use Committee (IACUC). Both governing bodies have their own policies and procedures regarding PI eligibility and each has a process for requesting an exception.

PIs must comply with all eligibility requirements regarding sponsored programs, human subject research, or animal research, as applicable.

Forms

1. [Sponsored Program Principal Investigator \(PI\) Eligibility Exception Form](#)
2. [VCUHS Employee Approval Form to Participate in VCU Sponsored Project Activities](#)

Related Documents

1. [Roles and Responsibilities Matrix](#)
2. [VCU Policy: *Faculty Promotion and Tenure Policies and Procedures*](#)
3. [VCU Policy: *Academic Rights and Responsibilities*](#)
4. [Human Research Policies and Guidance](#)
5. [Animal Research](#)

Revision History

This policy supersedes the following archived policies:

02/05/2015

Principal Investigator Eligibility

FAQ

1. I am completing a traineeship application. Who should be listed as the principal investigator?

Sponsor requirements determine who is listed as the principal investigator. Some sponsors require that the trainee be listed as the principal investigator; other sponsors require that the fellow's mentor be listed. Please follow sponsor instructions.

2. I am retiring from VCU, but can I continue to hold the position of principal investigator for a sponsored program?

No. Review the [Rehiring Retired Faculty](#) webpage for procedures for the part-time employment of retirees.

3. I am a university and academic professional wishing to serve as a PI on a sponsored program. What would constitute "support of [the] chair and dean OR divisional head when there is not an academic home" as detailed in the policy?

Support of the chair and dean (or divisional head) means that these individuals concur with a specific university and academic professional employee being eligible to serve as a PI. This will be documented by school level approval of a sponsored program in RAMS-SPOT. Each school and division will establish their own procedures for obtaining and documenting this approval internally.

4. I am currently an administrative & professional (A&P) faculty member. Will I continue to be eligible to serve as the PI on a sponsored program after 7/1/2018 when the HR Redesign is in effect?

PI eligibility will be based on current employee classifications as of 7/1/2018. Current A&P faculty may transition to a number of different employee classifications including, but not limited to, teaching and research faculty, term faculty, and university and academic professionals. If your classification after 7/1/2018 is not included in the "Individuals Eligible to Serve" section of the policy, you may seek an exception in order to serve as PI.

5. I currently have an affiliate position with VCU but do not hold a paid appointment. I am employed by another organization (for example, the Veterans Affairs Medical Center, Virginia

Commonwealth University Health System, or MCV Practice Plan). Am I eligible to serve as the PI on a sponsored program?

Requests for current non-employees to serve as the PI would need to be evaluated on a case-by-case basis. This request must be submitted through the standard exception process outlined in the policy. Most sponsored programs would require VCU to have an employer/employee relationship with the PI. Thus, if awarded, most situations would require that the individual obtain a paid appointment with VCU to be able to serve as a PI on a sponsored program at VCU.