Title: Principal Investigator Status on Sponsored Projects

University Division/Department: Office of the Provost

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I. PURPOSE
To provide information and guidance regarding who can and cannot serve as Principal Investigators on proposals for external funding submitted by, and on sponsored projects awarded to, Villanova University through the Office of Research Administration.

II. SCOPE
This policy applies to all sponsored (externally funded) projects initially submitted through the Office of Research Administration and subsequently awarded to Villanova University through the Office of Research Administration, regardless of whether the sponsor is a federal, state, local, corporate, non-profit, or foreign entity, and regardless of the primary purpose of the sponsored project.

III. DEFINITIONS
Principal Investigator - The Principal Investigator on a sponsored research project awarded to Villanova University (including grants, contracts, cooperative agreements, or other funding instruments) has primary responsibility for all technical aspects of a particular project, including the design, execution, and reporting of project work. In addition, the Principal Investigator has primary responsibility for management of project personnel and funds. The Principal Investigator is responsible for ensuring that all aspects of a project are conducted with integrity and in compliance with applicable Federal/State/local regulations, as well as University and/or sponsor-specific policies and procedures.

For the purposes of this document, the term Principal Investigator is equivalent to terms Project Director, Primary Contact, or other title, recognizing that various sponsors use different terminology for the person carrying the Principal Investigator responsibilities as described above.

Co-Principal Investigator - A Co-Principal Investigator on a sponsored project, recognized by both the external sponsor and the University, may play a central role in the design, development, execution, and/or management of a project. At the discretion of a Principal Investigator, some aspects of a project may be delegated to or shared with a Co-Principal Investigator. However, the ultimate responsibility for the technical, financial, compliance, and reporting aspects of a project all lie with the Principal Investigator.
IV. POLICY STATEMENT
Eligibility Guidelines for Principal Investigator or Co-Principal Investigator Status

1. All tenure-track or tenured faculty have Principal Investigator or Co-Principal Investigator status.
   
   a. Incoming tenure-track or tenured faculty may submit proposals for sponsored research prior to their date of first employment, provided that the individual will be employed at Villanova University at the time that award would begin.

2. Full-time, non-tenure track faculty, including post-doctoral fellows, may be given Principal Investigator or Co-Principal Investigator status on a proposal-by-proposal basis, if all of the following apply:

   a. their faculty appointment explicitly includes a percentage effort devoted to research, proportional to the effort to be directed toward a sponsored project, which will be maintained throughout the duration of a particular project,
   
   b. the faculty member has a commitment to remain employed by the University for the duration of a particular proposed project,
   
   c. the faculty member has access to the facilities, resources, space, etc. required to conduct the research, and
   
   d. the sponsor does not explicitly disallow non-tenure track faculty and/or post-doctoral fellows from being named as Principal Investigator or Co-Principal Investigator.

   Signatures of the relevant Department Chairperson and Dean on the Internal Proposal Form (submitted electronically through CAYUSE) associated with a particular sponsored project proposal, certifying that all four of the above criteria are met, are necessary and sufficient to qualify full-time, non-tenure track faculty, including post-doctoral fellows, as Principal Investigators or Co-Principal Investigators.

3. Post-doctoral fellows, graduate (Doctoral or Masters), or undergraduate students working on sponsored research can be Principal Investigators or Co-Principal Investigators when explicitly called for in the guidelines for a specific funding opportunity (e.g., NSF, Doctoral Dissertation Improvement Grants; NIH, Ruth L. Kirschstein National Research Service Awards for Individual Predoctoral Fellowships (F31) to Promote Diversity in Health-Related Research; NIH, Behavioral-Biomedical Sciences Interface Predoctoral Training Program). Otherwise, in general, Post-doctoral Fellows, graduate students, or undergraduate students may not be named as either Principal Investigator or Co-Principal Investigator on sponsored research proposals or projects.

4. Villanova employees who desire Principal Investigator or Co-Principal Investigator status for sponsored proposals/projects may apply for an exemption to the guidelines in section IV using the procedure described in Section V.
V. PROCEDURE
Exemption to Serve as for Principal Investigator or Co-Principal Investigator on Sponsored Projects

Villanova employees who desire Principal Investigator or Co-Principal Investigator status but do not qualify under the general guidelines above (e.g., part-time faculty, full-time staff, Research Associates, Post-doctoral Fellows, Emeritus faculty, Visiting faculty) may submit a request for exemption from the guidelines using the Principal Investigator Exemption Form; exemption requests are submitted to the Associate Vice Provost for Research. Such requests will be considered in light of:

a. the requestor’s demonstrated expertise and record of scholarship relative to the types of proposals that may be submitted,
b. indication that the proposer will be able to commit an appropriate level of time toward the management and execution of a sponsored project over the project’s entire duration,
c. indication that the requestor will have access to the facilities, resources, space, etc. required to manage and execute a sponsored project, and
d. assurance that the nature of proposals submitted for external support is consistent with the goals and/or objectives of the home department/center, the College, and the University.

Prior to submitting a Principal Investigator Exemption Request, the requestor must have completed CITI Responsible Conduct of Research Training and Human Subjects Research training (if proposed research projects are likely to involve human subjects) and must have submitted a Financial Conflict of Interest in Research disclosure form.

VI. RELATED INFORMATION/FORMS
Click on this hyperlink to access the Principal Investigator Exemption Request Form.

VII. HISTORY

VIII. RESPONSIBLE UNIVERSITY DIVISION/DEPARTMENT
Office of the Provost

IX. RESPONSIBLE ADMINISTRATIVE OVERSIGHT
Administrative Oversight Office:
   Office of Research Administration
   Middleton Hall Rm 1st
   800 Lancaster Avenue
   Villanova, PA 19085

General Telephone Number: 610-519-4220