Fred King, VP for Research   3-5-24

GENERAL POLICY 100
PRINCIPAL INVESTIGATOR ELIGIBILITY

1. PURPOSE & SCOPE:

1.1 Serving as a Principal Investigator for a Sponsored Program or Research is a privilege granted to certain individuals associated with West Virginia University and West Virginia University Research Corporation. Because of the oversight responsibility implicit in the engagement in Research and acceptance of funds for a Sponsored Program, the University must maintain a position of authority over the individual's actions throughout the life cycle of the activity.

1.2 The Purpose of this Policy is to set forth the eligibility requirements of a Principal Investigator at West Virginia University and West Virginia University Research Corporation and to describe the process for any approval.

1.3 This Policy applies to all University faculty, staff, students, and Research Corporation employees authorized to conduct Research or a Sponsored Program on behalf of West Virginia University or West Virginia University Research Corporation.

2. DEFINITIONS:

2.1 **Principal Investigator** ("PI") – A Principal Investigator is an individual who has the appropriate level of training, skill, authority, and responsibility to direct or co-direct a Sponsored Program or Research. They are the primary individual responsible for (1) the design, execution, and management of a Sponsored Program or Research, including the reporting requirements for a Sponsored Program or Research; and (2) compliance with applicable laws, regulations, and institutional policy governing the conduct of the Sponsored Program or Research.

Certain sponsors have a multiple PI model that accommodates team-based science and recognizes the contributions of team members for projects that do not fit the traditional single PI model. Under a multiple PI model, one investigator is named as the contact PI. While program guidance specifically states that being named contact PI does not imply any particular role within the leadership team other than being responsible for communication, the University and Research Corporation will treat the contact PI as the communication lead.

2.2 **PI of Record** – The PI of Record is an individual identified for internal purposes who is responsible for the conduct and oversight from the institutional perspective. A PI of Record is identified when an ineligible individual must be named as a PI for a Sponsored Program or Research.

2.3 **Research** means a systematic investigation, including research development, testing, and evaluation, designed to develop, contribute to, or disseminate generalizable knowledge.

Activities that meet this definition constitute research for purposes of this Policy, whether or not they are conducted or supported under a Sponsored Program.

2.4 **Sponsored Program** means a project or scholarly activity supported wholly or in part by an external sponsor that has a defined scope of work or set of objectives, which provide a basis for sponsor expectations. These projects may take the form of Research, instruction, training, or service.

2.5 **Compliance Requirement** means that the Research is subject to one or more of the University and Research Corporation's research compliance policies and procedures, including but not limited to conflict of interest, export control, human research protections, animal welfare, responsible conduct of research, or biosafety.

3. ELIGIBILITY FOR RESEARCH WITH A COMPLIANCE REQUIREMENT

3.1 Generally, a PI must (a) be employed by the University or the Research Corporation with a minimum employment status of 0.50 full time equivalent or be an active student, and (b) belong to an eligible category.

3.2 The following categories are eligible to be a PI for Research with a Compliance Requirement:

 3.2.1 **Faculty:** Tenured, Tenure-Track, Research Non-Tenure Track, Clinical-track, Librarian-track, Teaching-track, Service-track, and other non-tenure track including lecturers, senior lecturers, faculty equivalent or academic professionals.

 3.2.2 **Staff**: Directors of University recognized centers and institutes, and staff whose job description evidences that Research is part of the individual's job duties.

3.3 For clarity, the following individuals need prior approval from the Department, College, and respective Director of the compliance unit.

 3.3.1 **Faculty**: Adjunct, Emeritus, or Visiting faculty.

 3.3.2 **Post-Doctoral Scholars, Residents, and Fellows:** Generally, Post-Doctoral Scholars, Residents, and Fellows may not serve as a PI.

 3.3.3 **Students:** Students, unless a Sponsor's program guidelines require the student to be listed as PI on a protocol or compliance document.

 3.3.4 **Others:** Individuals who are not identified in Section 3.2, including those with Courtesy or Volunteer roles, should seek approval.

3.4 The continued employment of an eligible PI by the University or Research Corporation is a significant factor for demonstrating institutional oversight. If an eligible PI experiences significant change in employment, whether that is transiting to an Adjunct, Emeritus, or Visiting appointment, or otherwise transitions to an ineligible category, the eligibility must be re-evaluated, taking into consideration the PI's new role at the University or Research Corporation. In such situations, approvals pursuant to Section 3.3 are applicable.

4. ELIGIBILITY FOR A SPONSORED PROGRAM:

4.1 Generally, a PI must (1) be employed by the University or the Research Corporation with a minimum employment status of 0.50 full time equivalent, and (2) belong to an eligible category.

4.2 The following categories are eligible to be a PI for a Sponsored Program:

4.2.1 **Faculty:** Tenured, Tenure-Track, and Research Non-Tenure Track.

4.2.2 **Staff:** Directors of University recognized centers and institutes.

4.3 For clarity, the following individuals need prior approval consistent with Section 5.

4.3.1 **Faculty**: Clinical-track, librarian-track, teaching-track, service-track, and other non-tenure track including lecturers, senior lecturers, faculty equivalent or academic professionals; Adjunct, Emeritus, or Visiting faculty.

4.3.2 **Staff**: Non-classified and classified staff.

4.3.3 **Post-Doctoral Scholars:** Generally, Post-Doctoral Scholars may not serve as a PI but may serve as a co-investigator. However, if a Sponsor requires that a post-doctoral scholar be identified as the PI, it is allowable for the individual to be named PI the Sponsored Program. In these cases, an eligible PI must be named as the PI of Record and the Post-Doctoral Scholar will be identified as a co-PI for internal purposes only.

4.3.4 **Students:** Students, unless a Sponsor's program guidelines require the student to be listed as PI on the application, the student's mentor/advisor shall be the PI of Record.

4.3.5 **Others:** Individuals who are not identified in Section 4.2 should seek approval.

4.4 To the extent a project qualifies as Sponsored Program and Research, the Sponsored Program eligibility must be satisfied.

4.5 The continued employment of an eligible PI by the University or Research Corporation is a significant factor for demonstrating institutional oversight. If an eligible PI experiences significant change in employment, whether that is transitioning to an Adjunct, Emeritus, or Visiting appointment, or otherwise transitions to an ineligible category, the eligibility must be re-evaluated, taking into consideration the PI's new role at the University or Research Corporation. In such situations, approvals pursuant to Section 4.3 are applicable.

5. APPROVAL REQUESTS:

5.1 **Sponsored Programs:** The Department Chair or Supervisor of the proposed PI's, after consultation with the respective Dean or Vice President, shall submit such request on behalf of the individual for a specific Sponsored Program to the Director of Sponsored Programs. The request should demonstrate the following:

5.1.1 That the proposed PI has the appropriate qualifications to manage a Sponsored Program through training or experience; and

5.1.2 That the proposed PI's participation in the Sponsored Program will (a) fall within the individual's employment duties for the University or Research Corporation or (b) serve an educational purpose.

A College and Department may implement additional eligibility requirements, which will be managed at the College or Department level. The Director of Sponsored Programs will determine eligibility.

5.2 **Research:** The Department Chair or Supervisor of the proposed PI, after consultation with the

respective Dean or Vice President, shall submit such request on behalf of the individual for a specific project. The request should demonstrate the appropriate qualifications of the individual to manage the Compliance Requirements of the Research and demonstrate a benefit to the University. A College and Department may implement additional eligibility requirements, which will be managed at the College or Department level. The Director of the respective compliance unit will make a determination of eligibility.

6. REVOCATION OF ELIGIBILITY:

6.1 University and Research Corporation administration including compliance directors, sponsors, and regulators may request the restriction of PI status by outlining the reasons for such restriction, in writing, to the Vice President for Research. The Vice President for Research will meet with the Department Chair, Dean, and others as necessary to make and execute a decision to restrict PI status of otherwise eligible faculty, staff, and students. Reasons for revocation or restriction include but are not limited to: (1) findings of misconduct; (2) history of failure to meet deliverables or reports on current or past sponsored projects in a timely and orderly fashion; (3) unmanageable impairment of objectivity; (4) current investigation into possible misconduct; (5) fiduciary improprieties; or (6) actions by third parties warranting such actions.

7. IMPLEMENTATION AND ENFORCEMENT:

7.1 This Policy is effective March 1, 2024. Sponsored Programs due and Research submissions initiated on and after March 1, 2024, must be submitted with eligible PI. Sponsored Programs and Research submitted prior to March 1, 2024, will proceed under previous guidance.

7.2 Proposals for a Sponsored Program submitted by an ineligible PI are subject to withdrawal from the sponsor or the declination of an award. The decision to withdraw an unsanctioned proposal or decline an award lies with Vice President for Research with advice from the Dean and Vice President, as appropriate.

7.3 Any faculty, staff, or student who violates this Policy will be subject to appropriate disciplinary action, up to and including suspension without pay, or termination of employment or association with the University, in accordance with applicable (e.g., staff, faculty, student) disciplinary procedures.