

**UNIVERSITY OF CALIFORNIA, SANTA BARBARA
OFFICE OF RESEARCH**

SPONSORED PROJECTS POLICY

RESEARCH CIRCULAR B.1.

**POLICY ON PRINCIPAL INVESTIGATOR ROLES AND RESPONSIBILITIES
AND ELIGIBILITY TO SERVE AS PRINCIPAL INVESTIGATOR**

I. References.

- A. By-Laws and Standing Orders of The Regents 100.4 and 105.1a.
- B. University of California Contract and Grant Manual, Chapter 1, Section 200 et. seq. & 500 et. seq.; Chapter 2, section 200; and, Chapter 13, Section 500
- C. UCSB Research Circular A.1.

II. Roles and Responsibilities of Principal Investigators.

A. General Statement.

Proposals submitted by UCSB for the extramural funding of research, training, and public service projects, and extramural awards received for such projects, must name an eligible employee of the University (normally an employee with an academic appointment) to serve as Principal Investigator. Often, more than one principal investigator is attached to a particular proposal or award. Section II.D., below, describes the roles and responsibilities in the case of multiple principal investigators.

B. Definitions.

- 1. **Sponsored Project.** An extramurally-supported research, training or public service project related to research or scholarly or professional training to be performed with University resources or facilities, funded through a contract or grant. (See, Research Circular D.5. to distinguish between “gifts” and “grants.”)
- 2. **Principal Investigator.** A Principal Investigator (“PI”) is an employee of UCSB (usually with an academic appointment) who is, or becomes, eligible under UCSB policy to submit a proposal or administer an award for extramural support of a Sponsored Project. To qualify as a principal investigator, the researcher must *personally participate* in the project to a *significant* degree in the Sponsored Project.

There may be one or more Principal Investigators on a Sponsored Project. Multiple Principal Investigators shall be referred to as “Co-Principal Investigators.”

It is contrary to University policy, and is viewed with extreme disfavor by sponsoring agencies, to list as head of a project the name of an individual who will contribute only a minimum or nominal portion of their own time and effort to the furtherance of the work.

3. **Listed Principal Investigator(s).** Those Principal Investigators who are either: (a) listed on the University's proposal for extramural funding; or, when the proposal is funded, (b) the sponsor's award document that provides extramural support to the research, training or public service project.
4. **Sponsoring Principal Investigator(s).** Academic senate members who agree to provide oversight and guidance in the case where the proposed Principal Investigator does not meet the criteria to be automatically eligible to serve as a Principal Investigator, and it is determined that the proposed Principal Investigator would benefit from such oversight and guidance. The Sponsoring Principal Investigator may be listed on the proposal or award, or may be appointed for internal purposes only.

C. Roles and Responsibilities of Principal Investigators.

1. **Principal Investigator.**

The Principal Investigators (including "co-principal investigators") have *primary responsibility* for the scientific, technical and administrative conduct and reporting of the Sponsored Project. These responsibilities include:

- a. assuring the scientific integrity and management of the Sponsored Project;
- b. assuring the appropriate financial management of the Sponsored Project;
- c. assuring adherence to all internal University policies; and,
- d. assuring adherence to externally imposed sponsor terms and conditions including reporting and record keeping requirements contained in the award document.

Principal Investigators may make informal approaches to extramural funding agencies for the purpose of determining whether preparation of a formal, written proposal for a specific project is warranted. However, only members of the Office of Research with written, delegated authority may submit proposals or accept awards related to Sponsored Projects.

The Principal Investigator is also responsible for assuring the sponsored research activities start only after the Sponsored Projects Office has executed an appropriate award and all regulatory approvals are received.

It is reasonable and appropriate for the Principal Investigator to rely upon administrative staff for assistance in carrying out his or her responsibilities for administrative aspects of a Sponsored Project. However, the Principal Investigator *cannot* delegate the responsibilities enumerated by this Section to any administrative staff member.

2. **Listed Principal Investigator(s).** The Listed Principal Investigator, by the nature of the position, will be either the Principal Investigator or a Co-Principal Investigator on the award or proposal and as such, shall have the responsibilities outlined above.
3. **Sponsoring Principal Investigator.** The Sponsoring Principal Investigator has responsibility to oversee and guide the Principal Investigator. As such, the Sponsoring Principal Investigator is responsible for:
 - a. Understanding the Principal Investigator's project goals and methods;
 - b. Ensuring the Principal Investigator has access and adheres to University policies and practices as well as the terms and conditions of the award supporting the Sponsored Project;
 - c. Being available to the Principal Investigator to answer questions or provide guidance in complex or unusual situations;
 - d. Assure that the Principal Investigator is meeting his or her responsibilities, including reporting requirements; and,
 - e. In the event that the Principal Investigator is no longer available to serve as Principal Investigator, close-out the award and assure all final reporting and other requirements in the award terms are met.

D. Relationship between Principal Investigators.

The Principal Investigators have equal authority to manage the scientific and financial administration of the Sponsored Project.

As a general practice, the Sponsored Projects Office requires all Principal Investigators involved in a particular project to mutually agree on any substantive changes to the award or proposal terms before it will act upon a request for such a change. The term "substantive change" includes, but is not limited to, the withdrawal of a proposal, the termination of an award, the transfer of an award, the addition of new Principal Investigators, and the removal of any Principal Investigators. However, it is recognized that in rare instances, the Principal Investigators may be unable to agree on the necessity to make a substantive change to the proposal or award. In such event, the following shall apply, unless the sponsor's proposal guidelines or award conditions state otherwise:

1. If there are Listed Principal Investigator(s), the Listed Principal Investigator(s) shall be the final authority.
2. In the case of a Principal Investigator or Listed Principal Investigator and a Sponsoring Principal Investigator, the Sponsoring Principal Investigator shall have final authority.

In the event that there are multiple principal investigators within any one category, mutual agreement within the category is required before the Sponsored Projects Office will consider a substantive change to the proposal or award.

III. Eligibility to Serve as Principal Investigator.

A. The following individuals are eligible to serve as Principal Investigators, including Listed Principal Investigators, for extramural contracts or grants:

1. Members of the Academic Senate, including the following titles, whether in regular or emeritus status:

Chancellor	Professor
Vice Chancellor	Professor-in-Residence
Provost	Research Professor
Dean (Academic)	Associate Professor
Director of Academic Program	Associate Professor-in-Residence
Registrar	Assistant Professor
Librarian	Assistant Professor-in-Residence
Instructor	Acting Professor
Lecturer (with security of employment)	Acting Associate Professor

2. Physical Education or University Extension Specialists who will personally participate in a significant manner in training or training-related research projects.

3. Appointees over 50% time in the Professional Research series.

4. Appoints over 50% time in the Adjunct Professor series.

5. The following senior administrative positions: the Director of the Art Museum, the Director of the Orfalea Family Children's Center, and the Chief of Police.

B. Multiple Principal Investigators.

When a proposal or award for a Sponsored Project has more than one Principal Investigator, each Principal Investigator must meet the eligibility criteria or receive an exception to policy (as set forth in Section C, below).

C. Exceptions to Serve as Principal Investigators.

Authority to approve exceptions to the eligibility requirements for Principal Investigator status is vested in the Vice Chancellor for Research. Authority to approve exceptions is re-delegated under certain circumstances to Department Chairs and ORU Directors. These circumstances are outlined in Section IV.A. of this policy.

1. Exceptions for University employees who do not meet the eligibility requirements may be requested under the following conditions:

a. the project is in the best interests of the University;

b. the project or program will contribute to the basic instructional or academic plan of the department or organized research unit;

- c. adequate space is available;
 - d. the individual is qualified to undertake the proposed project or program; and,
 - e. adequate administrative resources are available within the department to provide necessary assistance with project management and oversight.
2. Exceptions typically fall into one of the following categories. Requests not in one of the following categories should include detailed justification specifying the special circumstances that warrant the request being approved.
- a. For Professional Research appointees at less than 50% time.
 - b. For students to submit proposals for fellowships, dissertation research grants, or field research grants to be awarded to The Regents, when an extramural funding agency requires that the student originating a project also be the individual who initiates the application for funding, but only if a member of the Academic Senate or separately approved individual is identified as the student's Sponsoring Principal Investigator
 - c. For courtesy appointments (e.g., Research Associate) to serve as Co-Principal Investigators, with the understanding that such individuals cannot at any time assume the role of sole Principal Investigator.
 - d. For other academic research titles (e.g., Specialist or Postdoctoral Researcher) who wish to serve as Co-Principal Investigators on a project, with an established history at this campus of successfully conducting research.
 - e. For other specialty titles (e.g., Museum Director), when the nature of their position requires them to head research, public service, or instructional projects.
3. Blanket exceptions may be requested for identifiable groups of individuals, within a department or organized research unit (ORU), whose primary duties relate to the conduct of extramural projects and who, individually, would qualify for an approved exception. Blanket exceptions, once approved, will remain in effect until revoked by the requesting department or organized research unit (ORU).

D. Substitute Principal Investigators and/or Co-Principal Investigators

Individuals identified as Principal Investigators on a proposal submitted to an extramural sponsor are expected to be the individuals who direct the project in the event an award is made. If, during the term of an awarded project, circumstances require the appointment of a substitute Principal Investigator, such substitutes must meet the eligibility requirements stated in section B above, or be approved to serve on an exceptional basis in accordance with section C, above. Substitute appointments shall be reviewed and approved by the Office of Research prior to notification of the awarding agency.

IV. Procedure for Requests for Exceptions

A. Signature of a department chair or ORU director on the Office of Research proposal approval form (Data Sheet) shall constitute evidence of approval for the following types of exceptions:

1. Research appointees at less than 50% time to serve as Co-Principal Investigator in conjunction with an eligible individual.
2. Graduate students and postdoctoral students to serve as Co-Principal Investigator on fellowship, field work or dissertation projects only (the student may be identified as the Principal Investigator if so required by the agency, but an eligible or otherwise approved individual must be named as Co-Principal Investigator.)

B. Other requests for exceptions to serve as Principal Investigator or Co-Principal Investigator are to be submitted to the Office of Research on Office of Research Form 99 (copy attached).

C. Requests for blanket exceptions are to be submitted by memorandum from the requesting Department Chair or ORU Director to the Vice Chancellor for Research and must address the elements specified on the Form 99.

D. Requests to appoint substitute Principal Investigators or Co Principal Investigators are to be submitted by memorandum to the Office of Research for review and transmittal to the sponsoring agency. In general, such requests require the prior approval of the sponsor agency if the substitution is to be for a period of three months or more (although certain agencies may have different requirements.) The memorandum should specify the length of the substitution, the reason, and the qualifications of the substituting individual.

First Issued: February, 1972

Last Revised: February, 2003, effective: February 15, 2003

Attachments

- A. Office of Research Form 99
- B. Table of PI Approval Authority

Steven Gaines
Acting Vice Chancellor for Research

**Table of Approval Authority
For exceptions to serve as Principal Investigator**

Appointment	Project Type	Approval to Serve as Sole PI	Approval to Serve as Co-PI
Academic Senate Member	All	Eligible	Eligible
Professional Researchers ¹ more than 50% appt.	All	Eligible	Eligible
Professional Researcher Less than 50% appt.	All	OR	Department Chair/ ORU Director
Adjunct Professor More than 50% appt.	All	Eligible	Eligible
Adjunct Professor Less than 50% appt.	All	OR	OR
Postdoctoral Researcher	All	OR	OR
Graduate Students	Fellowship/Dissertation/ Field Research Projects	Not eligible	Department Chair/ ORU Director
Graduate Students	All other projects	Not eligible	OR*
Postdoctoral Students	Fellowship/Dissertation/ Field Research Projects	Not eligible	Department Chair/ ORU Director
Postdoctoral Students	All other projects	Not eligible	OR*
Courtesy Appointments (Research Associate)	All	OR*	OR
Other Academic Research Titles (Specialist, Visiting Researcher, etc.)	All	OR	OR
Other Specialty Titles (Museum Director, Lecturer w/out Security of Employment, Director of Administrative Department)	All (normally projects closely aligned with the nature of their position)	OR	OR
Physical Education or University Extension Specialists	Training or Training- Related Projects	Eligible	Eligible
Physical Education or University Extension Specialists	All other projects	OR	OR

*Requests may be considered, but exceptions are rarely granted and only with demonstration of strong justification.

Department Chair/ORU Director: Signature on UCSB Data Sheet constitutes evidence of approval of the exception, unless the department or ORU has established alternative procedures.

OR (Office of Research): Requests shall be in the form of a completed Form 99 and directed to the Contract and Grant Officer serving the administering unit.

¹ Professional Researchers include the following payroll titles: Full Researcher, Associate Researcher, and Assistant Researcher.

**REQUEST FOR EXCEPTION
TO SERVE AS PRINCIPAL OR CO-PRINCIPAL INVESTIGATOR
(Form 99)**

Requests for exceptions to serve as principal or co-principal investigator are issued pursuant to Research Circular B.1.

To determine if an individual is eligible to serve as principle investigator, see Section III.A.

To review the role and responsibilities of principal investigators, please see Section II.C.1

To review the role and responsibilities of sponsoring investigators, please see Section II.C.3

Exception for:

_____	_____	_____
Name	Signature*	Date
_____	% Time _____	Appt. End Date _____
Current Payroll Title		

**I understand that approval of this exception does not imply that the University will extend my current appointment period, nor does it obligate the University to do so.*

Agency :

Co-PI (if any) :

Project Title:

Administering
Department/ORU:

1. State why it is necessary for the individual seeking this exception to serve as principal investigator on this project or program.

2. Summarize the individual's qualifications to undertake this project, including their prior history of serving as a Principal Investigator or Co-Principal Investigator on grants or contracts awarded by extramural sponsors, and the extent of their experience and knowledge of UCSB policies and procedures related to research.

Approvals:

Co-PI (if any):

Name: _____ Signature: _____

Department Chair/ORU Director

Name: _____ Signature: _____

Vice Chancellor for Research or Designee:

Signature: _____ Date: _____

Sponsoring Investigator Required?

Yes: _____ No: _____

If yes, Name: _____ Signature: _____

All Sponsoring Investigators should carefully review Research Circular B.1. to understand their role and responsibilities.