UNIVERSITY OF MIAMI

UNIVERSITY OF MIAMI POLICY AND PROCEDURE MANUAL

TITLE:	PI Eligibility Policy	REFERENCE: New
CATEGORY:	Office of Research Administration	PAGE: 1 of 3
		SUPERSEDES: New
APPROVER:	Barbara A. Cole Associate Vice President Office of Research Administration	VERSION: New EFFECTIVE: 03/01/2016

PURPOSE:

The purpose of this policy is to identify who is eligible to act as a principal investigator (PI) on externally funded sponsored projects in accordance with 2 CFR 200, Federal and State regulations, as well as sponsor terms and conditions.

Failure to comply with the University of Miami's (UM's) policies and procedures may result in unfavorable review, denial of funding, request for clarification/documentation, additional terms and conditions, and/or other enforcement actions imposed by the sponsor. This policy applies to all Federal and non-Federal sponsored activities, including all externally funded clinical trials.

SCOPE:

All UM personnel must be aware of the complex and detailed rules provided under Federal and non-Federal regulations as well as the terms and conditions of the individual sponsored activity. While compliance with all applicable requirements is essential, it is equally important to maintain an open research environment that welcomes the participation of researchers from around the world as part of UM's mission. To maintain this balance, UM personnel must be familiar with this policy in addition to the Federal and non-Federal regulations on sponsored activities. It is the responsibility of all UM personnel to be aware of UM policies and exercise reasonableness in managing all sponsored activities appropriately.

The Office of Research Administration is responsible for providing information to sponsoring agencies that demonstrate the University has fulfilled the terms and conditions of receiving the award.

The Office of Research Administration is responsible for helping UM personnel understand and comply with this policy.

All faculty, including voluntary faculty and courtesy appointments.

- Faculty emeriti engaged as active researchers on UM research activities.
- Researchers, including research staff, postdoctoral fellows, and research associates.
- Graduate students, undergraduate students, and interns involved in research programs.
- Staff in departments, centers, institutes, and administrative offices charged with responsibilities under this policy.

- Consultants, agents, and volunteers associated with research and scholarly activities, as well as in departments and offices charged with responsibilities under this policy.

POLICY:

Eligibility to act as a principal investigator (PI) or co-investigator (Co-I) on externally funded sponsored projects at UM is a privilege limited to full-time faculty. PIs or Co-Is are designated by UM and approved by the sponsor to direct a project. They are responsible and accountable for the proper programmatic, scientific or technical conduct of the project and its financial and regulatory management.

Exceptions to the PI Eligibility Policy may be made as described below:

1. **Fellowship/Career Development Awards Exception**
   Researchers who are not full-time faculty may be approved as a PI on projects generically referred to as Fellowship/Career Development Awards, whose stated purpose is to advance the individual's scientific career. The researcher applying for these types of funds must meet the PI qualifications defined by the sponsor in the funding announcement. If so, these exceptions may be approved if the project is to be carried out under the mentorship of an established full-time faculty member who is named in the proposal, and if the project can be conducted within the overall intellectual scope and laboratory space of the faculty mentor. In these cases, the awards cover only the individual's salary and incidental expenses, but not incremental staff or students.
2. **Pending Appointments for New Full-Time Faculty Exception**
   Full-time faculty whose appointment start date is in the future may apply for proposals through UM provided the project period start date is not prior to the appointment start date and the appointment has been approved by the Chair/Dean and Human Resources. In these cases, awards cannot be accepted until the faculty member's appointment has begun.
3. **Case By Case Exception**
   Researchers who are not full-time faculty may request an exception and be approved as PIs outside of Exceptions 1 and 2 (above) on a case-by-case basis. The researcher must meet the PI qualifications defined by the sponsor in the funding announcement. If so, these exceptions require a Commitment/Letter of Support from the Chair/Dean that states (1) how the individual is scientifically and technically qualified to act as PI on the project, (2) that the Chair/Dean will support this individual during the life of the project, providing any needed office/lab space, equipment, etc., 3) whether a plan exists to move such an individual into a full-time faculty position, and 4) that the Chair/Dean will identify another individual to act as PI should the individual leave UM before the project ends.

Application/Proposal Packages citing the exception requested and including a Commitment/Letter of Support (Exception 3 only) must be approved by the PI, and the department chair or designee, and submitted to ORA 10 day's advance of the final application. ORA will then solicit required approvals:
- For Gables/RSMAS Proposals - Vice Provost for Research
- For Medical Proposals - Executive Dean for Research and Vice Provost for Research

DEFINITIONS:

Please refer to UM's Office of Research Administration (ORA) website for a list of acronyms and terms commonly used in sponsored/ research administration grants, contracts, and cooperative agreements: http://ora.miami.edu/_assets/pdf/ora-policies/glossary.pdf

PROCEDURE:

UM personnel are to use UM's ORA website for guidance on matters pertaining to sponsored activities.

UM personnel are to follow the Standard Operating Procedures (SOP) outlined, as well as utilize the various required forms and templates that have been implemented for the activities related to this policy.

UM personnel should contact the Pre or Post Award staff for consultation if additional information is needed. Contact information can be found on UM's ORA Contacts Webpage.