CALIFORNIA STATE UNIVERSITY CHANNEL ISLANDS
POLICY MANUAL

Division of Academic Affairs	**Policy Number:** SP 23-05
Approved By: Academic Senate	**Effective Date:** Spring 2024
November 7, 2023	**Page** 1 of 6
Approved By: Richard Yao, President	
TBD	

Policy on Principal Investigators

PURPOSE: To determine the minimum qualifications, and normal responsibilities of Principal Investigators for sponsored programs beyond those imposed by the Sponsor. These qualifications include, but are not limited to, employment by the University or Auxiliaries.

BACKGROUND: Revision

POLICY:
Accountability: Provost, Vice Presidents, Deans, Associate Deans, Program Chairs, Directors, Faculty, Research & Sponsored Programs

Applicability: All eligible CSU Channel Islands (CSUCI) faculty and staff as identified below.

Definition(s):

Sponsored program(s): Programs for work performed under Grants or Contracts funded by non-CSU funding sources (including non-CSU funded Contracts and Grants that are subsequently subcontracted to another campus).

Principal Investigator: Principal Investigator (PI) means the individual (whether referred to in the Contract or Grant as a Principal Investigator, Project Director, or other similar term) designated by the Sponsored Program Administrator to be responsible for ensuring compliance with the academic, scientific, technical, financial, and administrative aspects and for day-to-day management of the Sponsored Program.

Co-Principal Investigator or Co-Investigator (Co-PI/Co-I) –Co-PIs/Co-Is are key personnel who have responsibilities similar to that of a PI on research projects. While the PI has ultimate responsibility for the conduct of a research project, the Co-PIs/Co-Is are also obligated to ensure the project is conducted in compliance with applicable laws and regulations and institutional policy governing the conduct of sponsored research.

Text:

Principal Investigator Eligibility:
Tenured and full-time probationary tenure-track faculty, and University administrators (MPP) are authorized to participate as PI of externally-funded research and sponsored programs, as are individuals within CSUCI's volunteer status (non-employee) who meet very specific qualifications and funder criteria. Other individuals must be approved by the Provost and their Vice President (if outside Academic Affairs) in accordance with the established criteria for the appointment of an individual to Provisional Principal Investigator status (see below). All PIs must be willing and able to work with the Research & Sponsored Programs office, Business & Financial Affairs, and CSUCI Foundation or University Advancement staff (if appropriate) to ensure adherence to CSUCI, CSUCI Foundation (as applicable), CSU, and sponsor policies, procedures, and regulations.

Criteria for the Appointment of an Individual to Provisional Principal Investigator Status:
In most cases Provisional PI status is determined on the basis of employment. Emeritus faculty, FERP faculty, Lecturer faculty and non-MPP staff members may also be appointed to Provisional Principal Investigator status with written approval and with agreement to abide by all the responsibilities that PI status requires.

Eligibility for Continuance of Provisional Principal Investigator Status:
Continuation of Provisional Principal Investigator Status will be dependent on demonstrated competence in meeting program objectives, managing external funding, and adherence to CSUCI, CSU, and sponsor policies, procedures, and regulations. Requests for Provisional Principal Investigator status will be reviewed by the Provost in consultation with Research and & Sponsored Programs.

Principal Investigator Roles and Responsibilities:
The PI is responsible for the development of proposals in compliance with CSU, CSUCI, CSUCI Foundation (if applicable) and funding agency policies, procedures, and requirements, including development of proposal budgets to include only costs that are reasonable, allowable, and allocable. The PI has the dual responsibility for complying with the financial and administrative policies of the award while achieving the goals and objectives of the project. PIs are responsible for working with the Research & Sponsored Programs office and University Advancement staff (if applicable) on proposal submissions and adhering to CSUCI 's Proposal Administrative Review (PAR) Process. PIs are not authorized to accept a sponsored project that is awarded to the University. Only an Authorized Organizational Representative of the University (resp. the Foundation) may accept a sponsored project that is awarded to the University (resp. the Foundation).

A PI operates under the supervision of the Provost, their Program Chair, and Dean, or Associate Vice President or other administrative unit supervisor. It is the PI's duty to continuously exercise responsible judgment in the administration of the project and effectively train and supervise project staff.

In addition to completing the scope of work as prescribed in the funded proposal, PIs must:

1. Serve as the project manager for the sponsored project or, in the event that the sponsored project provides funds to hire a dedicated project manager, supervise the project manager.
2. Work with Research & Sponsored Programs to replace any Co-PIs who are no longer available to continue working on the sponsored program.
3. Initiate, execute and manage expenditures on award funds.
4. Track the budget for the sponsored program and meet at least annually with Business & Financial Affairs (and/or CSUCI Foundation if the sponsored program was awarded to the Foundation) for budgetary review and project status. Meetings may include RSP to review potential need for no-cost extension, budget modifications or changes requiring prior sponsor permission.
5. Ensure that expenditures on award funds are allowable and do not exceed the approved budget. Ensure that budget modifications are made when necessary and obtain prior approval of the sponsor, when required.
6. Comply with sponsor, CSUCI, CSUCI Foundation (if applicable) and CSU policies, procedures, rules and regulations during the day-to-day operation of the project and when making any changes to the scope of work or funded budget.
7. Be responsible for ensuring Responsible Conduct of Research (RCR) training of project participants when required by the Sponsor or by CSU policy.
8. Disclose any potential conflicts of interest at the time of application and/or if one arises during the life of the project when required by the Sponsor and CSU policy.
9. Submit required progress/technical reports to the funding agency on or before the report deadline.
10. Provide a copy of progress/technical reports and correspondence (such as budget
11. modifications, changes in key personnel including PI, major changes to the scope of work or project deliverables, progress/technical report deadline extensions) with the funding agency to RSP (or CSUCI Foundation, if applicable).
12. Comply with applicable Sponsor rules and regulations during the day-to-day operation of the project and when making any changes to the scope of work or funded budget.

Failure to comply with responsibilities may result in restrictions that may include, but are not limited to, limiting the PI's ability to spend sponsored project funds or restricting the employee's privilege to act as a PI for future sponsored projects.

Authorship of Grant Applications:
Any person eligible via the above criteria to serve as PI may wish to apply on behalf of the University to agencies of the Federal, State, and local government, private industry, private foundations, or corporations for grants-in-aid of research, scholarship, or creative activities. Applications are submitted in the name of California State University Channel Islands or the California State University Channel Islands Foundation when required by the sponsor.

1. A potential academic employee (one who has accepted an official job offer, such as in the spring for a fall semester assignment) may apply for a grant or contract before employment at CSUCI for the period of time when they will be employed.
2. The receipt of any grant or contract by a part-time or probationary faculty member or by an academic employee hired on a yearly or temporary basis does not guarantee continued employment by the University. Nor does the receipt guarantee laboratory or office space beyond the initial commitment of the grant.

Transfer or Replacement of PI:

Business & Financial Affairs and Research & Sponsored Programs (or University Advancement staff, if applicable) are jointly responsible for assessing and negotiating all transfers of sponsored projects to another institution, and/or the transfer of equipment purchased with sponsor funds to another institution. A representative from Business & Financial Affairs and the designated Sponsored Program Administrator are the only authorized University officials to directly negotiate with the Sponsor.

Satisfactory progress on individual sponsored projects is determined by the Sponsor on a project-by- project basis. Any issues and/or concerns with the performance of a PI regarding adherence to University, Sponsor or federal policies and procedures will be initially addressed with the PI by Research & Sponsored Programs, Business & Financial Affairs and/or Human Resources depending on the issue. If the PI is non-responsive or if the response does not result in corrective action and future adherence to University policies and procedures, the situation will then be referred to the respective Program Chair, Dean, AVP and/or the Provost or appropriate Division Vice President as necessary for assistance and resolution.

The PI is responsible for the timely submission of written notification to the Provost (or appropriate Division Vice President) and the Research & Sponsored Programs office when requesting a change of PI status voluntarily on a sponsored project. Voluntary transfer or replacement occurs when a PI intends to leave the institution willfully, retires, or is unable to continue performing work on a sponsored project. Faculty taking sabbatical who wish to continue to work on a sponsored program must receive written approval from the President through a request submitted to Faculty Affairs.

Involuntary transfer or replacement of a PI occurs when the PI refuses to continue performing work on a sponsored project, is not in good standing with their Sponsor or the University (*e.g.,* under temporary suspension or disciplinary action), or is not eligible to serve as the PI due to a change in employment status with the University. In the case of a temporary suspension, if the PI is returned to duty, they will also be restored to PI status.

In the event that a PI must be involuntarily replaced on a sponsored project, it is the responsibility of the Provost (or appropriate Division Vice President) to provide written notification to the PI, Research & Sponsored Programs, Dean, AVP, and Program Chair stating why the PI is not in good standing with a funder or the University. In all cases, when a PI is involuntarily removed from a sponsored project they may not apply for additional grants or contracts until they are in good standing with the University.

Whether the transfer or replacement of a PI is voluntary or involuntary it is the responsibility of the Provost (or appropriate Division Vice President) to notify Research & Sponsored Programs to ensure that work on the grant continues until a new PI has been appointed in accordance with the Sponsor's policies.

*Distribution of responsibilities among Principal Investigators on Multi-Institutional Sponsored programs***:**

Some sponsored program activities require collaboration between more than one institution. In such cases, the responsibilities of all participating institutions and PIs shall be defined in written agreements signed by the institutions' respective authorized agents. Representative examples of acceptable agreement instruments include subawards, subcontracts and memoranda of understanding (MOU). All such agreements shall stipulate that all parties will adhere to appropriate institutional policies governing sponsored programs administration and any specific sponsor requirements. Multi-Institutional sponsored programs must adhere to the Proposal Administrative Review (PAR) process administered by RSP.

Principal Investigators proposing Multi-Institutional Sponsored Programs shall ensure receipt of completed and authorized proposals from proposed sub recipients for inclusion in the proposal prior to submission.

EXHIBIT(S):

[Provisional Principal Investigator Request Form](https://www.csuci.edu/rsp/award-cycle/build-a-proposal/documents/provisional-pi-request-form.pdf) (https://www.csuci.edu/rsp/award-cycle/build-a-proposal/documents/provisional-pi-request-form.pdf)