Policy on Principal Investigator (PI) Status
Boston University
(April 14, 2011)

The PI Status Request Form can be found at http://www.bu.edu/research/policies.
Table 1 can be found at: http://www.bu.edu/research/files/2011/04/Title-Chart_FINAL.pdf

Definitions:

A Principal Investigator (PI) has full responsibility for the oversight of a sponsored project, including the design, development and implementation of the technical plan; as well as all administrative aspects, and financial and non-financial compliance aspects of the project. The PI is fully responsible for the academic quality of the project and for ensuring compliance with the terms, conditions, and policies of the sponsor and the university.

Multiple PIs: Some agencies allow for multiple principal investigators who share fully in both leading the scholarly activities and in the responsibility for all compliance issues connected with the project.

A Co-Principal Investigator (Co-PI) is relevant as a designation on a grant application whenever allowed by the sponsor. The Co-PI is a member of the research team who plays a major role in one or more aspects of the project (e.g. conceptual design of the technical aspects of the project, management of the technical implementation, and administration of the project). Moreover, subject to approval by the funding agency, a Co-PI may have to step in and assume the full responsibility of the project in the absence of the PI provided that (a) he/she is automatically eligible for or can be granted PI Status under this policy and (b) whenever he/she is empowered by the PI, or the relevant Dean, Vice President for Research, or Provost.

General Principles and Guidelines:

• The PI designation involves two distinct functions: (i) an academic function of assuming the responsibility for the intellectual content of a grant, and the ability to oversee the design, development and implementation of the research project and (ii) a regulatory function of assuming responsibility for financial and non-financial compliance with the regulatory requirements of both the sponsor and the institution in the course of the research connected with the grant.

• From an institutional perspective regulatory oversight involves assuming the responsibility for (i) the grant’s budget, (ii) ensuring compliance with University protocols (e.g. IBC, IRB, IACUC, RSC, Laser Safety, Lab Safety (non-biological), and (iii) reporting potential conflicts of interest and relevant
changes in the sources of these potential conflicts through the university Conflict of Interest disclosure process.

- Independent of source, all applications for external funding must convincingly demonstrate the ability to carry out both the academic and regulatory functions.

- Eligibility for Boston University PI Status implies that the PI designation is allowed by the sponsor for that particular position/title and that the investigator takes responsibility for both academic and regulatory functions connected with the research project.

- Just as in the case of externally funded projects, all research carried out at Boston University, whether funded by the institution or unfunded, requires full regulatory oversight by an eligible party.

- Depending on position, title and rank, university personnel may (a) be automatically eligible for PI Status, (b) be ineligible for PI status, or (c) be eligible for PI status only after approval by the appropriate university official(s). As outlined in the body of this document, exceptions to the policy will only be made under very special circumstances and will require filling out the Request for Principal Investigator (PI) Status form. The following procedures determine if and under what conditions the university will allow a particular individual to be designated as PI on a grant, as defined by this policy and summarized in Table I1.

**General Policy (see Table I¹):**

**(a) Automatic Full PI privileges:**

Faculty who serve more than 50% time in unmodified standard faculty positions defined in Section A of “Classification of Ranks and Titles” in the faculty handbook2 as well as those in the clinical and research tracks of the standard faculty positions, (except those in an Instructor position and all its modified forms), have automatic “PI – rights”, i.e., they can represent the university as PIs

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¹ Table I (in Appendix A ) summarizes the eligibility (Y) or non-eligibility (N) for assuming the separate academic and regulatory functions of a PI for individuals in the major position designations at Boston University; the information in parenthesis (e.g. (d i)) labels the place in the policy (Section (d),(i)) where the specific policy statement can be found.

² Full time appointments (100% time) correspond to 9 months on the CRC and 12 months on the Medical Campus.
on grant applications and are eligible to serve as PIs on university protocols without additional institutional approvals.

(b) No PI privileges:

(i) Visitors (in all designations), Instructors (only on the CRC), and short-term (less than two years) employees cannot serve as the PI on grants submitted through Boston University and are also not eligible for PI Status on internal protocols.

(ii) Undergraduate and graduate students cannot serve as PIs on research grants and are not eligible for PI Status on internal protocols. When funded or unfunded projects that involve undergraduate or graduate students require internal regulatory approvals, the direct supervisor (the undergraduate teacher/advisor, doctoral mentor, or staff supervisor) assumes the PI responsibility for all internal protocols.

(iii) Administrative staff cannot serve as PIs on research projects and are not eligible for PI status on internal protocols.

(iv) *Industrial partners*, who are eligible to use university facilities through contractual arrangements with the university, are not eligible for PI status on either proposals submitted through Boston University or on internal protocols.

(c) PI privileges with approval:

(i) Faculty who serve less than 50% time in positions with “automatic PI-rights” as defined in (a) may assume the role of PI on a Boston University grant provided that:

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3 In the context of this policy “automatic privileges” implies that for these members of the faculty, the PI privilege is built into their initial appointment, and as long as there is no change in status this privilege requires no additional approvals. However, all proposals, irrespective of the level of PI privileges of the investigator(s), must be processed through the appropriate Office of Sponsored Programs (OSP) and must comply with all institutional policies and procedures governing the submission and management of grants.

4 Research carried out in university facilities by such outside agents must involve a genuine collaboration with a faculty member (as defined in (a)) who is both actively involved in the research and takes responsibility for all regulatory aspects by assuming the role of PI on internal university protocols relevant to the project. Such projects can be funded through a joint grant on which the Boston University faculty member takes full PI responsibility or through a Sponsored Research Agreement (SRA) to a (full-PI-privileges) faculty member’s laboratory.
o He/she is not a permanent employee (> 50% time) of and/or benefits from full PI rights at another academic institution, company, or organization
o PI Status is approved by the appropriate Provost, Dean and Chair of the home academic unit.

(ii) Those holding (unmodified or modified) titles of Lecturer or Instructor (the latter only on the Medical Campus) may sign as PI on an external grant provided that:
  o PI Status is approved by the appropriate Provost, Dean, and Chair of the home academic unit.

(iii) A long-term employee in non-faculty research positions (* in Table I) may sign as PI on an external grant provided that:
  o PI Status is approved by the appropriate Provost, Dean, and Chair of the home academic unit.

(iv) In exceptional cases, an individual in a non-permanent, non-faculty research position (** in Table I, e.g. post-docs) (with an appointment of two years or more) may sign as PI on a grant provided that:
  o He/she is a full-time employee or covered full-time by a grant awarded to Boston University.
  o PI Status is approved by the appropriate Provost, Dean, Chair of the home academic unit, and direct supervisor/mentor.

(v) Adjunct faculty (with an appointment of two years or longer) may sign as PI on a grant provided that:
  o PI Status is approved by the appropriate Provost, Dean, and Chair of the home academic unit.

(vi) Retired or emeriti faculty may serve as PIs on a grant provided that:
  o They are approved for an “extension of service,” which must be reviewed annually by the Provost.
  o PI Status is approved by the appropriate Provost, Dean, and Chair of the home academic unit.

(vii) In situations involving employees who are leaving the university (whether or not they are granted “adjunct” status) the Department Chair will take responsibility for managing the transition of the grant to another institution, managing the process for delivering the research promised, or returning the grant to the relevant funding agency.

(d) Exceptions:

(i) Undergraduate and graduate students, administrative and non-
faculty research staff, or Instructors on the CRC (of any designation) may assume the role of PI on pre-doctoral, post-doctoral, or career advancement fellowships or grants which do not involve internal university research protocols.

(ii) Under the rare occasions, involving special-purpose research or thesis grants with specific agencies (e.g. the American Psychoanalytic Association Fund for Research for graduate student thesis research), undergraduate or graduate students, or other research personnel in positions with no PI Status under this policy (visiting students, instructors on CRC, etc.) may be given PI status on the grant application. In those cases Boston University will allow the PI designation as an academic function with the approval of the direct supervisor (the undergraduate teacher/advisor or doctoral mentor) and/or the appropriate Department Chair and Dean. However, when the associated research requires internal regulatory approvals, the direct supervisor (the undergraduate teacher/advisor, doctoral mentor, or staff supervisor/department chair) will assume the PI responsibility on internal protocols.

(iii) Administrative staff may serve as PIs on facilities grants, construction grants, administrative grants, or other infrastructure grants with the approval of the relevant Provost (for a campus-centric project) or of the Vice President for Research (for university-wide projects).

(iv) Under special circumstances, other exceptions to this policy can be made and require approval of the appropriate Department Chair, Dean, and Provost.

(e) Processes and other provisions:

(i) All research faculty and staff are eligible for Co-PI Status (when the designation is allowed by the sponsor) provided that either he/she or another Co-PI on the grant is eligible to assume full intellectual and administrative oversight in case the PI cannot satisfy his/her responsibilities.

(ii) Exceptions to this policy or approval of PI Status for those not automatically eligible will require approval through the submission of a “Request for Principal Investigator (PI) Status”\(^5\) form to the appropriate Chair, Dean and Provost. A copy of the approved form will be sent to the Dean’s Office and the Office of Sponsored Programs (OSP) to be processed with the grant application.

\(^5\) The “Request for PI-Status” form is attached as Appendix B.
(iii) All cases that do not involve faculty with automatic PI-rights require a periodic annual or multi-year review process, as indicated on the Request for PI-status form. Both the PI-status and the frequency of the PI-status reviews must be approved by the appropriate Chair, Dean, or Provost on the Request for PI-status form.