PI/Co-PI/Co-I Eligibility

Sponsored Projects Administration
UNIVERSITY OF GEORGIA

Effective:	04/01/2022
Last Reviewed:	04/01/2022
Owner:	Jill Frazier Tincher
Area:	Sponsored Projects Admin
Applicability:	UGA System-Wide

POLICY AND PROCEDURE

PURPOSE:
The purpose of this policy is to ensure compliance with the standards set forth in the Federal Office of Management and Budget 2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200), Federal and State regulations, and sponsor-specific requirements. This policy provides guidance, which will assist University of Georgia (UGA) personnel proposing, performing and managing sponsored activities. Direct costs on sponsored projects must be allowable, allocable, and reasonable.

Failure to comply with UGA policies and procedures may result in audit findings, suspension of sponsored activities, closer monitoring by the sponsor, delays in final payments, and/or other enforcement actions imposed by the sponsor. This policy applies to all Federal and non-Federal sponsored activities, including all externally funded activities.

SCOPE:
All UGA personnel must be aware of the complex and detailed rules provided under Federal, State regulations, as well as terms and conditions of individual sponsored activities.

POLICY:
Sponsored projects will comply with all applicable Federal, State and/or sponsor-specific costing policies. This is applicable to building proposal budgets, negotiating sponsored projects, setting up sponsored projects, as well as initiating, approving, invoicing and reporting costs.

Eligibility to act as a principal investigator (PI), co-principal investigator (Co-PI) or co-investigator (Co-I) on externally funded sponsored projects is a privilege which comes with unique responsibilities. PIs, Co-PIs or Co-Is are designated by UGA 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. Additionally, when the Department Dean/Chair, Institute/Center Director or designee approves a proposal within the Grants Portal, he/she is committing to supporting the PIs/Co-PIs/Co-Is during the life of the project, providing needed time, office/lab space, equipment, etc. needed to perform the scope of work.

Any employee who holds one of the following ranks and who has signed the University of Georgia Intellectual Property Agreement may serve as a PI/Co-PI/Co-Investigator on a sponsored project:

    A. Regular Full-Time Tenured or Tenure-Track Faculty
          1. Assistant Professor
          2. Associate Professor
          3. Professor

B. Regular Full-Time Non-Tenure Track Faculty
1. Assistant Research Scientist
2. Associate Research Scientist
3. Senior Research Scientist
4. Clinical Assistant Professor
5. Clinical Associate Professor
6. Clinical Professor
7. Public Service Representative
8. Public Service Assistant
9. Public Service Associate
10. Senior Public Service Associate
11. Academic Professional Associate
12. Academic Professional
13. Senior Academic Professional
14. Librarian I-IV

In addition to A and B above, there are many other individuals who perform and pursue external funding for research and other sponsored activities. UGA recognizes, appreciates and encourages these individuals' efforts.

This policy does not limit who can be a PI, Co-PI or Co-I. This policy acknowledges three exceptional circumstances which ensure anyone can be considered for PI, Co-PI, and Co-I status provided they meet the eligibility criteria of the sponsor and UGA. These exceptional circumstances memorialize the support needed to facilitate successful project performance as described below:

1. **Fellowship/Career Development Awards**
External sponsors have funding opportunities geared towards predoctoral, postdoctoral, early career, junior faculty-level scientists, and established career scientists. These individuals may not fall into one of the ranks shown in A and B above, but they may meet the sponsor eligibility criteria. These specific funding opportunities are intended to advance the individual's scientific career. In some cases, these individuals may carry out their work under the mentorship of an established full-time, regular faculty member who is named in the proposal, and the work may occur within the office/laboratory space of the faculty mentor. In these cases, please follow Procedure 3a on Page 3.

2. **Pending Appointments for New Regular Full-Time Faculty**

UGA may be recruiting a new faculty member whose (a) appointment falls into one of the ranks described in A and B above, (b) appointment has reached All Approvals in UGAJobs, and (c) UGA start date is in the future. These individuals may submit proposals through UGA as a PI, Co-PI or Co-I provided they meet the sponsor's eligibility criteria and the project start date is after the individual's UGA start date. Please follow Procedure 3a on Page 3.

3. **Case-By-Case**
For any other individuals desiring to be a PI, Co-PI or Co-Investigator who meet the sponsor's eligibility criteria, who do not meet the ranks described in A and B, and who do not fall into the exceptional circumstances described in 1 and 2 above, they will use the case-by-case process to ensure they have in place the support needed to facilitate successful project performance. Please follow Procedure 3b on Page 3.

Examples of case-by-case scenarios include but are not limited to:
   a. Ranks of instructors, lecturers, or
   b. Appointment status of adjunct and emeritus (non-compensated affiliates), as well as part-time and limited-term.

DEFINITIONS:

Funding Opportunities come in various forms. Some sponsors release or post on websites funding opportunities – also known as funding announcement, broad agency announcements, call for proposals, request for bid, request for quote, etc. The funding opportunity defines all requirements associated with the submission – qualifications of the institution; qualifications of the PI/Co-PI; how/when submissions occur; forms; page limitations; funding limitations; cost share requirements; indirect cost limitations; etc.

Principal Investigator/Co-Principal Investigator/Co-Investigator (PI/Co-PI/Co-I) are terms used by our external sponsors usually signifying the leaders of a project and essential to performing the scope of work. These terms and definitions can vary by sponsor, as well as vary by funding opportunity. Please review the sponsor-specific requirements to ensure individuals meet the requirements of each funding opportunity.

Sponsored Projects are externally funded activities that must be separately budgeted and accounted for according to terms of the sponsoring organization, State regulation, and UGA policy. Sponsored Activities are provided through grants, contracts, and agreements with any Federal Agency, State Agency, or non-Governmental Organization that supports research, training, instruction, public service and other activities.

Sponsor-specific Requirements are specific requirements stated within the sponsor rules/regulations, funding opportunity announcement, award/grant or contract/agreement and amendments.

PROCEDURE:

When preparing a proposal, negotiating and setting up a sponsored project, incurring and approving expenses, and invoicing and reporting, UGA personnel must be aware of and conform to the complex and detailed rules surrounding PI/Co-PI/Co-I eligibility.
   1. PIs/units are strongly encouraged to review the funding opportunity and sponsor requirements.
   2. PIs/units should identify who will be PIs/Co-PIs/Co-Is and clearly identify them as such within the proposal documents.
   3. Review this policy and identify if any Exception/s will be pursued:
      a. If exceptional circumstances 1 or 2 apply:
         i. Upload the funding opportunity into the Grants Portal as a proposal document under the type "Proposal RFP."
         ii. Add a comment in the Grants Portal under the Proposal Workspace. Locate the Communications button on the left side of the screen and add a Comment stating "Exception 1 (or 2) applies."
      b. If exceptional circumstance 3 applies:
         i. Obtain a Commitment/Letter of Support from the Dean or Center/Institute Director containing the following components:

1. How the individual is scientifically and technically qualified to act as PI/Co-PI/Co-I on the project;
2. The Chair/Dean will support this individual during the life of the project, providing any needed time, office/lab space, equipment, etc.;
3. Define whether a plan exists to move this individual into a faculty position; and
4. The Chair/Dean will identify another individual to act as PI/Co-PI/Co-I should the individual leave UGA before the project ends.

   ii. Upload the Commitment/Letter into the Grants Portal as a proposal document using type "Proposal Other." The description box should note "PI/Co-PI Eligibility Exception" to differentiate this from other proposal documents.
   iii. Upload the funding opportunity into the Grants Portal as a proposal document under the type "Proposal RFP."
   iv. Add a comment in the Grants Portal under the Proposal Workspace. Locate the Communications button on the left side of the screen and add a Comment stating "Exception 1 (or 2) applies."

4. Alert SPA of your PI/Co-PI/Co-I exception request and the need for SPA review/approval.
5. SPA will review and update PI/unit on the disposition of their exception request.
6. If there are any questions regarding conflicting regulations/requirements, please contact Sponsored Projects Administration for clarification on which regulation/requirement applies.

RESOURCES:
2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

Sponsored Projects Administration
UNIVERSITY OF GEORGIA

Sponsored Projects Administration | 706-542-5939 | http://spa.uga.edu