I. SCOPE

This interim Principal Investigator Eligibility & Assurances Policy (“Policy”) applies to faculty and staff at Arcadia University who plan to lead a Sponsored Project.

II. POLICY STATEMENT

The purpose of this Policy is to ensure that Sponsored Projects are led by qualified Principal Investigators who have the technical competence and administrative experience to assume responsibility for successful accomplishment of all aspects of the Sponsored Project.

III. POLICY

It is the policy of the University that only Eligible Personnel (as defined below) may serve as Principal Investigators since there must be direct accountability to the University, the Sponsor, and any governmental regulators. Certain other individuals may serve as Principal Investigators as described under Section B below.

A. Eligible Personnel

The University has designated the following personnel as eligible to serve as Principal Investigators on Sponsored Projects:

- Any full-time faculty member regardless of academic rank and tenure status provided that the Sponsor does not announce its own specific requirements;
- Term faculty (visiting professor, adjunct, research associate, special lecturers, etc.) may be allowed to serve as Principal Investigator if the Sponsored Project commences and terminates within the term of his/her appointment or while they are on the University payroll. However, a Co-Principal Investigator from the full-time faculty ranks must be appointed to work with the term faculty;
- Full-time staff members who have sufficient qualifications and education to carry out the Sponsored Project;

<table>
<thead>
<tr>
<th>Policy Title</th>
<th>Principal Investigator Eligibility &amp; Assurances Policy</th>
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<tbody>
<tr>
<td>Policy Category</td>
<td>Academic/Research Policies</td>
</tr>
<tr>
<td>Policy Approval Date</td>
<td>April 20, 2015</td>
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<td>Policies Superseded</td>
<td>None</td>
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<tr>
<td>Responsible Office/Vice President</td>
<td>Office of Sponsored Research and Programs (OSRP), Provost and VP for Academic Affairs</td>
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<tr>
<td>Frequency of Review</td>
<td>Three Years</td>
</tr>
<tr>
<td>Date of Next Review</td>
<td>July 3, 2021</td>
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• Full-time research faculty; and
  Part time faculty or staff may be allowed to serve as Principal Investigator. However, a Co-
Principal Investigator from the full-time faculty ranks must be appointed to work with the part-
time faculty or staff.

B. Special Circumstances

Under special circumstances other qualified individuals may be designated to serve as Principal
Investigators. Such designation requires the approval of the Provost and must be endorsed by the Chair
of the department and the Dean of the College in which the Sponsored Project is to be performed. If
granted, this Principal Investigator designation is limited to the proposed Sponsored Project under
consideration; it does not afford blanket status to serve as a Principal Investigator on other Sponsored
Projects. To qualify for the Special Circumstances, the following criteria must be met:

• The Sponsored Project must be a programmatic priority of the University;
• There must be no qualified member of the faculty who is capable of serving or available to
  serve as the Principal Investigator;
• The proposed Principal Investigator must possess the academic and experiential qualifications
  that are prerequisite to serve as a Principal Investigator and his or her participation as the
  Principal Investigator must be necessary for the successful funding and execution of the
  Sponsored Project;
• The proposed Principal Investigator must enter into a signed agreement (by means of an
  appointment letter) with the University assuring that (a) the work will be conducted in
  accordance with the high standards of quality expected of all Principal Investigators; (b) the
  Principal Investigator will comply with all University policies relating to the conduct of
  research; and (c) the Sponsored Project will be conducted in accordance with all federal laws
  and regulations relating to the conduct of research;
• If an individual qualifies as a Principal Investigator under these Special Circumstances and is
  not a full-time University employee, a Co-Principal Investigator from the full-time faculty ranks
  must be appointed on all proposals for that person; and
• The Principal Investigator designee must complete the Principal Investigator Approval Form
  and all necessary approvals identified on the form must be secured.

C. Retired Faculty Serving as Principal Investigators

Some faculty members may wish to continue their research programs after retirement from the
University, but do not qualify for status as Principal Investigators because they are no longer University
employees. Active retired faculty members may be allowed to submit proposals at the discretion of the
Provost or his/her designee. The Principal Investigator Approval Form must be completed for this
purpose.

D. Graduate Students as Principal Investigators

The Office of Sponsored Research and Programs acknowledges the importance of permitting graduate
students to lead Sponsored Projects where appropriate. There are several sponsors or funding agencies
who offer grants whereby the work is conceived and carried out entirely by a graduate student. In these
cases, a full time faculty member must be identified to serve as mentor and oversee the project on a
nominal basis, and the Principal Investigator Approval Form must be completed.
There may be other sponsors or funding agencies for whom the need for submission of the proposal through the University is not required because the grant will be awarded to a student directly, and not to the University. In this case, the student may submit the application directly to that sponsor or funding agency without coordination with the OSRP.

E. Principal Investigator Eligibility Revocation

The University, for cause may withdraw the status of Principal Investigator. An academic administrator should submit such request in writing to the Provost or his/her designee.

The following reasons for withdrawal include, but are not limited to:

- A finding of misconduct or current investigation into possible misconduct;
- A history of failure to meet the Sponsor and University deadlines for specific deliverables, including but not limited to, progress reports, final reports, no-cost extension documentation, effort reports, and any significant financial interest disclosure; and
- An unmanageable conflict of interest.

F. Principal Investigator Assurances

The University Routing Committee must approve all grant proposals before they are submitted to the Sponsor for consideration. When a Principal Investigator submits a grant proposal, the Principal Investigator assures by signing the Proposal Routing and Approval Form, available on OSRP website:

- That the proposed Sponsored Project and University mission are compatible;
- That the information contained in the grant application, and any corresponding documentation, is true, accurate, and complete to the best of the Principal Investigator’s knowledge;
- That the Principal Investigator is ultimately responsible for all aspects of the Sponsored Project, including technical content and quality;
- That the Principal Investigator will take responsibility for proper stewardship of awards;
- That the Principal Investigator shall be responsible for total compliance with all policies, terms and conditions of the award set by the Sponsor, as well as, all University policies and procedures which govern sponsored funding;
- The timely submission of technical reports, and financial management of the Sponsored Project;
- That all arrangements have been made and all University approvals have been secured in writing to fund any cost sharing or other special resources needed to conduct the work;
- That no false, fictitious or fraudulent statements or claims have been or will be made;
- That the Principal Investigator, and other personnel and contractors on the sponsored Project have not been debarred or suspended from doing government-sponsored work;
- That the Principal Investigator, and all other investigators on the grant, will submit Significant Financial Interest Disclosure Forms; and
- That the Export Control Policy of the University is observed.

IV. DEFINITIONS

Appointment Letter is the University document that informs the eligible party that he or she has been appointed to the position of Principal Investigator for the Sponsored Project.
Principal Investigator is the individual designated by the University, pursuant to an Appointment Letter, or as stated on the Proposal Routing and Approval Form, to have the appropriate level of authority and responsibility to direct the Sponsored Project.

Co-Principal Investigator is designated in some circumstances and shares the authority and responsibility for leading and directing the Sponsored Project, intellectually and logistically. The Co-Principal Investigator is responsible and accountable to the Sponsor, and the University, for the proper conduct of the Sponsored Project including the submission of all required reports.

OSRP is the Arcadia University Office of Sponsored Research and Programs.

Principal Investigator Approval Form is the document that must be submitted by non-Eligible Personnel, when Special Circumstances exist that permit non-Eligible Personnel to serve as Principal Investigators. This form can be found on the OSRP website.

Significant Financial Interest (SFI) Disclosure Forms are required documentation by the University to ensure that all investigators who are responsible for the design, conduct, or reporting of research results and their immediate family members, do not hold significant financial interests which could influence the outcome of a Sponsored Project. This form can be found on the OSRP website.

Sponsor is the organization or funding agency that funds a Sponsored Project.

Sponsored Projects are externally funded activities in which a formal written agreement such as, a grant, award, sub-award agreement, cooperative agreement, contract, or fellowship is executed between University and the Sponsor.

University is Arcadia University, its colleges, schools, affiliates, divisions and subsidiaries.

University Routing Committee consists of members nominated by the University. The Committee reviews all grant proposals that are to be submitted to the Sponsor for funding consideration.

IV. EFFECTIVE DATE

WHEN APPROVED

V. SIGNATURE, TITLE AND DATE OF APPROVAL

By: [Signature]
Date: [Date]

VI. DATES OF REVIEW

- July 3, 2018; Approved by Provost John Hoffman.