RES-011

Investigator Eligibility Requirements and Responsibilities Related to Sponsored Programs

Effective Date Tuesday, September 7, 2021

Status Final

Last Revised Thursday, September 18, 2025

Policy Type University

Contact Office Sponsored Programs (Office of)

Oversight Executive
Vice President for Research

Applies To Academic Division and College at Wise.

Table of Contents

Policy Statement
1. PI Eligibility
2. Exceptions to PI Eligibility Requirements
3. Ongoing Eligibility of PIs
4. Federal Requirement
5. Responsibilities
6. Compliance with Policy

Reason for Policy

This policy establishes institutional eligibility requirements and ongoing responsibilities of individuals holding senior/key roles on sponsored programs awarded to The Rector and Visitors of the University of Virginia and administered by the Office of Sponsored Programs. These requirements are necessary to meet the University's obligations to sponsors and to facilitate compliance with award terms and conditions.

Definition of Terms

Investigator

Description

The project director or principal investigator and any other person, regardless of title or position: (1) who is responsible for the design, conduct, or reporting of research or proposed research, which may include, for example, senior research staff, collaborators, or consultants; and (2) whose research is supported by extramural funding (not internal funds or gifts).

Principal Investigator (PI)

Description

The individual(s) designated by the applicant organization/recipient to have the appropriate level of authority and responsibility to direct the project or program to be supported by the award. The applicant organization may designate multiple individuals as program directors/principal investigators (PD/PIs) who share the authority and responsibility for leading and directing the project, intellectually and logistically.

Sponsored Program

Description

Any externally funded research, public service, or scholarly activity (including hosting or attending conferences) at the University that has a defined scope of work often including a set of specific programmatic objectives and/or deliverables, and line-item-based budget, providing the basis for sponsor expectations and awardee accountability (i.e., a reciprocal transfer of something of value). Sponsored programs are funded through grants, agreements, and contracts that include terms and conditions for the disposition of tangible properties and outcomes (e.g., equipment, records, specified technical reports, theses, or dissertations) or intangible properties and outcomes (e.g., rights in data, copyrights, and inventions). **Note:** The terms *sponsored program*, *sponsored project*, s*ponsored award*, and/or *sponsored activity* are often used interchangeably.

Policy Statement

As the recipient of sponsored programs awarded to support the activities of its faculty, the University is responsible for establishing, administering, and monitoring processes and procedures to meet its obligations to the sponsors and to comply with all applicable requirements. The type of research (or other supported activities), funding source, performance location, materials and methods, and other factors will determine the full range of requirements applicable to a sponsored program. In order to fulfill these obligations, the University has designated specific roles and responsibilities related to the oversight of sponsored programs.

Investigators are individuals who play a significant role in the design, conduct, or reporting of research and share in the associated responsibilities such as adherence to research integrity principles, professional standards and norms, institutional policies, and compliance with applicable regulatory requirements (e.g., national/federal, state, indigenous/tribal, locality, and sponsor).

A principal investigator (PI) is an investigator designated by the University to direct the activities supported by a sponsored program. The PI is responsible on behalf of the University for the sound technical, fiscal, and administrative management of the project or program in accordance with both University and sponsor requirements. Throughout this policy the term PI includes program directors and co-principal investigators.

1. **PI Eligibility:**
   Only elected members of the faculty may submit sponsored program proposals. Elected members of the faculty include:
   - Professors
   - Associate Professors
   - Assistant Professors
   - Acting Assistant Professors
   - Emeritus Faculty

While any elected member of the faculty is eligible to submit proposals, they may only serve as a PI on a sponsored program if, at the time the award is established, they have a paid appointment at UVA which is at least commensurate with the duration and level of time/effort they are expected to commit to the sponsored program.

Deans, whether or not elected members of the faculty, are eligible to serve as a PI on a sponsored program proposal or award.

2. **Exceptions to PI Eligibility Requirements:**
Pre-doctoral students and post-doctoral trainees (i.e., research associates and fellows) may, when required by the sponsor or program guidelines, serve as PI on sponsored program proposals for mentored fellowships. The elected member of the faculty serving as the mentor will be the named PI in the University's financial system and is responsible to the University for the technical and fiscal oversight of the project. Other exceptions to the PI Eligibility Requirements, above, will be considered by the executive director, Office of Sponsored Programs, provided the individual meets all the following criteria. The individual has:
    - An employee relationship with the University at the time of the award (i.e., it is expected that the individual would be receiving pay from the University at that time) at least commensurate with the duration and level of time/effort they are expected to commit to the sponsored program(s).
    - Received a written guarantee of space and administrative support by the appropriate unit leader (e.g., department chair, associate dean, or director).
    - The endorsement of the appropriate unit leader (e.g., department chair, associate dean, or director) and executive (e.g., dean or vice president).

    A request for an exception to the PI Eligibility Requirements, above, must:
    - Address the specific need for making the exception (e.g., sponsor requirement).
    - Explain how allowing the person to serve as a PI will further the University mission, institutional priorities, and career development of the individual.
    - Document the individual's relationship with the University, their appointment, any space commitments, administrative support commitments.
    - Specify the requested length of time for the individual to serve as a PI (e.g., one-time request for a specific proposal or a set duration) which may not exceed the duration of the individual's appointment.

    Incomplete requests will not be considered.

    Denial of an exception request may be appealed to the vice president for research who will make the final determination regarding PI eligibility.

3. **Ongoing Eligibility of PIs:**
Except for pre-doctoral students and post-doctoral trainees on mentored fellowships, individuals must maintain an active paid appointment at UVA that is at least commensurate with the duration and level of time/effort committed to active sponsored programs on which they are a PI (e.g., senior/key personnel). Faculty appointments are made by, and once accepted, may only be changed by the school/department/unit.

    Except for pre-doctoral students and post-doctoral trainees on mentored fellowships, individuals without a paid appointment at UVA may not serve as a PI on a UVA sponsored program. If a PI's paid appointment

at UVA is ending (e.g., retirement or taking a position elsewhere), they must work with their school/department/unit, department, division, or institute, as appropriate) research administrators to determine the best approach to enable an individuals' ongoing participation on a sponsor program (e.g., release the award or subcontract to the individual's new institution; or work with the sponsor and OSP to designate a new PI and make the individual a paid consultant or unpaid advisor).

Extended periods of full-time or part-time leave, paid or unpaid, by PIs must be reported to unit research administrators who will conduct an evaluation to determine if the nature, timing, and duration of the leave necessitates changes to committed effort, research performance timelines, or personnel on sponsored programs. Unit research administrators will work with the Office of Sponsored Programs to request approvals from research sponsors when required. ***Note:*** *Investigators are advised to consult school/department/unit research leaders or the Office of Sponsored Programs regarding what constitutes an extended period of leave that needs to be reported.*

4. **Federal Requirement:**
   As mandated by the Creating Helpful Incentives to Produce Semiconductors (CHIPS) and Science Act of 2022, federal sponsors now require additional individual and institutional disclosures and certifications pertaining to research security (see Appendix for relevant definitions from the Act referenced in this section).

   Covered individuals must disclose all participation in foreign talent recruitment programs (FTRPs).

   Covered individuals are prohibited from participating in a malign foreign government recruitment program (MFTRP) at the time of proposal to a federal research sponsor and throughout the life of any subsequent award, direct or flowthrough. Covered individuals must certify at the time of proposal, and annually for the duration of the award, that they are not a party to a MFTRP.

   For the purpose of compliance with federal requirements, all UVA investigators named on proposals to or affiliated with awards from a federal agency, direct or flowthrough, are covered individuals. Federal agencies may designate additional personnel or roles as covered individuals.

5. **Responsibilities:**
   With respect to sponsored programs, the ***vice president for research*** is responsible for:
   - Establishing criteria for who may serve as a PI on institutional proposals, awards, and other research-related agreements.
   - Setting institutional requirements to maintain PI privileges.
   - Determining when it is appropriate to temporarily suspend or permanently revoke an individual's PI privileges.

   The ***associate vice president for research operations and executive director of sponsored programs*** is responsible for:
   - Approving/denying requests to allow spending on sponsored programs when a PI is ineligible and/or when any named investigator is not current on required disclosures and/or training.
   - Approving/denying requests for exceptions to PI eligibility requirements.
   - Approving/denying requests for temporary extension of disclosure and/or training completion requirements to facilitate timely proposal submission.
   - In collaboration with other University offices/officials, overseeing investigations into possible noncompliance with University research policies, sponsor requirements, or laws and regulations

pertaining to the proposal, conduct, or reporting of research and, when warranted, making notifications and reporting results of investigations to appropriate internal officials and external parties.

The ***Office of Sponsored Programs*** is responsible for:

- Establishing institutional standard operating procedures for the submission, negotiation, acceptance, modification, ongoing management, invoicing, and financial management of sponsored programs and research-related agreements.
- Granting/approving access to appropriate systems (e.g., proposal development, sponsor reporting, and financial administration) for individuals meeting eligibility requirements to be a principal investigator.
- Developing procedures to confirm PI and Investigator eligibility, disclosure status, and training completion at appropriate points in the sponsored program lifecycle (i.e., from proposal to award closeout).
- Coordinating with compliance and training program administrators to maintain a list of PIs and investigators on proposals and active sponsored programs.
- When needed, requesting approval from sponsors for modification to active sponsored programs.

Principal investigators are responsible for technical, fiscal, and administrative oversight of sponsored programs including, but not limited to, the following:

- Fostering ethical conduct, including upholding research and professional integrity principles.
- Establishing a safe and respectful research environment that complies with all applicable federal, state, and University policies, including those policies prohibiting discrimination, harassment, retaliation, and other forms of interpersonal violence and provides the opportunity for all members of the research team to thrive and succeed.
- Adopting and implementing procedures to safeguard research data in compliance with sponsor requirements as well as applicable University policies, state and federal laws and regulations.
- Informing all supported personnel (e.g., faculty, post-doctoral researchers, trainees, students, volunteers, and support staff) of applicable sponsor training and compliance requirements and confirming completion by the UVA or sponsor deadline, whichever occurs first. Examples of sponsor requirements may include the following:
    - Completion of responsible conduct in research training. (See sponsor terms and conditions and UVA's Responsible Conduct of Research Program website for additional information.)
    - Adherence to Research Security Program Requirements. (See sponsor terms and conditions and UVA's Office of Research Security website for more information.)
- Timely submitting accurate and complete reports (e.g., research performance progress, invention or intellectual property, training/mentoring activities, technical, or clinical trial status/progress).
- Sharing research data and products as specified in approved data management and sharing plans or other data access requirements. (See sponsor terms and conditions and RES-002, Ownership, Retention, Safeguarding, Management, and Transfer of Research Records, for more information. Consult the Office of Sponsored Programs regarding the need for a Data Use Agreement.)
- Providing general oversight of expenditures to confirm they are for the performance of the sponsored program, do not exceed approved budgets, and are in accordance with sponsor requirements as well as University policies and procedures, including those related to reporting/certification of payroll charges and/or effort expended.
- Submitting proposals and contracts to the necessary offices for review and approval by an authorized signatory, in accordance with FIN-036: Signatory Authority for Executing University Contracts.

- Being knowledgeable of sponsor approval requirements regarding personnel, budgetary and programmatic changes to sponsored programs. Submitting and receiving prior approvals when required, e.g., budget reallocations, significant reductions in effort by or changes to PI(s), restricted expenditures such as equipment and travel, or timeline extensions.
- Notifying and working with unit research administrators and relevant compliance offices prior to any extended period of leave (full-time or part-time) or change in physical location (e.g., absence from Grounds) that might impact responsibilities for ongoing research activities, including those related to compliance oversight and/or reporting (e.g., human subjects, animal subjects, biosafety, or export controls).

Investigators, including PIs, are responsible for:

- Maintaining current and accurate disclosures with the Office of Vice President for Research (OVPR) (e.g., significant financial interests, external activities, including appointments; FTRP participation; and other research support) and Provost's Office (e.g., external consulting and external appointments).
- Following the regulations and policies of research sponsors including, but not limited to, making complete and accurate disclosures of affiliations and research activities, funded and unfunded, in documents or form fields typically called "Other Support" or "Current and Pending." Each investigator is solely responsible for the completeness and accuracy of their disclosure(s) to sponsors.
- Completing initial and/or refresher training as required by the OVPR (e.g., conflicts of interest and research security) and/or research sponsor (e.g., other support disclosure training).

Unit research administrators (e.g., individuals or research administration offices in a school/department/unit, division, or institute) are responsible for:

- Assisting PIs with communicating to supported personnel and monitoring for compliance with UVA and sponsor training, mentoring, data access/sharing, and research security requirements.
- Notifying and coordinating with the Office of Sponsored Programs to obtain any necessary approvals from research sponsors prior to implementing or authorizing changes to sponsored programs or UVA systems (e.g., research administration or financial systems).

All individuals involved in research or research administration, regardless of role, are responsible for reporting suspected noncompliance with University policies, sponsor requirements, or applicable laws/regulations to the OVPR or other appropriate University office or official. Reports may be made anonymously through the Compliance Helpline.

6. **Compliance with Policy:**
   Failure to comply with the terms of this or other University policies governing the proposal, conduct, or reporting of research may result in disciplinary action up to and including termination or expulsion in accordance with relevant University policies.

   The OVPR will take action to address instances of noncompliance with applicable sponsor requirements, including submission of deliverables (e.g., progress reports, prototypes, or software/code), as well as laws and regulations governing research activities. Internal actions may include written warnings; notifications to academic leadership (e.g., department chair, dean, and provost); mandatory training/retraining; denial or revocation of access to sponsored funds; repayment or return of funds to sponsor(s); temporary or permanent revocation of PI privileges (e.g., submission of proposals and oversight of awards); and/or removal or exclusion of supported personnel who are out of compliance with applicable requirements

(e.g., training or disclosure) from participation on the sponsored research.

The Office of Sponsored Programs and other offices with delegated authority will not submit a proposal if any PI is ineligible or if any named investigator (e.g., PI or senior/key personnel) is not current on required disclosures. Similarly, spending on sponsored programs will not be permitted if any PI is ineligible, if any named investigator is not current on required disclosures and/or training.

In some instances, noncompliance will be reported to the research sponsor and/or appropriate regulatory or law enforcement agency(ies).

Direct questions about this policy to the Office of Sponsored Programs.

Related Information

UVA Code of Ethics for Faculty and Staff (approved by the Board of Visitors 12/6/2019) and Mission Statement (fully approved 1/14/2014)
Notice of Non-Discrimination and Equal Opportunity
HRM-009: Addressing Discrimination, Harassment, and Retaliation
HRM-041: Addressing Sexual and Gender-Based Harassment and Other Forms of Interpersonal Violence and Reporting Disclosures
HRM-045: Faculty External Consulting and Internal Overload
IRM-002: Acceptable Use of the University's Information Technology Resources
IRM-003: Data Protection of University Information
IRM-004: Information Security of University Technology Resources
IRM-017: Records and Information Management
RES-004: Research Misconduct
RES-005: Financial Conflicts of Interest for Research Investigators
RES-009: Proposal, Acceptance and Management of Sponsored Programs
PROV-009: Faculty Holding Appointments at Other Institutions or Organizations
AAU Principles on Preventing Sexual Harassment in Academia | Association of American Universities (AAU), adopted at October 2021 meeting. (Note: *UVA is a member of AAU.*)

Major Category Research Administration

Next Scheduled Review Saturday, July 1, 2028

Revision History

Revised *Investigators, including PIs* Responsibilities 9/18/25; Revised Sections 5 & 6 7/1/25; Added Section 4 and revised Section 5 5/22/24; Added pre-doctoral students/post-doctoral trainees to Section 2 4/21/22; Added VPR responsibilities, modified Compliance section 2/18/22.

Supercedes Policy Text

Elements from Policy VIII.A.1, Grants and Contracts – Definition, Solicitation, Clearance and Acceptance; Procedure 8-8, Request for an Individual Not Meeting Policy Criteria to Serve as a Principal Investigator; and the PI responsibility statement from RES-009, Compliance with Sponsor Requirements.

Approved By Policy Review Committee

Approved Date Tuesday, September 7, 2021