

PI Eligibility

I. PURPOSE

To define eligibility requirements for serving as a Principal Investigator (PI) on VA approved projects which are administered through The Veterans Health Foundation (VHF). This policy ensures that sponsored projects are conducted by those who have the requisite training, skill, commitment and resources as well as the appropriate relationship to the University affiliate

II. POLICY

The PI(s) is the individual(s) who is approved by the VA and the sponsor to design, execute and manage an externally sponsored project. The PI has full authority for the programmatic, scientific or technical and intellectual direction of the research and its financial oversight. While grants, contracts and other binding agreements are awarded to the VHF not to the individual PI, it is the PI who has the responsibility for direction of the research project and compliance with governing sponsor and VA policies and regulations and applicable state or federal laws.

PIs must exhibit high standards of ethical, professional and scientific conduct in the oversight of VA research or research conducted at affiliated institutions and prior employers. VHF reserves the right to decline administration of funds if accepting the funds poses potential risk to the foundation or does not address issues that benefit the health and welfare of Veterans. The Veterans Health Foundation does not ordinarily grant PI rights to individuals who do not hold an appointment or employment with the University affiliate. A PI is required to have the following in place prior to submitting an application through VHF:

- A. Paid or Without Compensation (WOC) status at the VA.
- B. Approved Scope of Practice on file with Research Office

The Executive Director (ED) reserves the right to decline a grant application at his or her sole discretion. An appeal of any denial may be made to the Executive Committee for further review. In reviewing the application the Executive Committee will consider a number of factors relating to the potential PI and/or proposed work, including, but not limited to, professional qualifications, research experience, professional reputation, past professional conduct, potential risk to VHF, availability of adequate facilities and support, current VHF staff workload, PI's good standing of university affiliation, adequate time of PI to complete the proposed work, and the applicability of the proposed work to VHF's mission. Approval or denial of the grant application appeal is at the sole and absolute discretion of the Executive Committee. Any such decisions are final and unappealable.

III. DEFINITIONS

For the purpose of this policy, the terms below have the following definitions:

- A. **Principal Investigator (PI):** This title identifies the individual responsible for the conduct of the sponsored program project. This responsibility includes the intellectual conduct of the project, fiscal accountability, administrative aspects, and the project's adherence to relevant policies and regulations. A project may have multiple individuals as PIs, who share the authority and responsibility for leading and directing the project, intellectually and logistically. Each PI is responsible and accountable for the proper conduct of the project.
- B. **Sponsor:** A sponsor may be a government agency (federal, state, local or international), a foundation, a private corporation or a non-profit organization. Sponsors differ in the type of proposals they accept, the type of award offered (e.g., grant, contract, cooperative agreement, other transaction), their method of payment, the terms of their awards and the types of cost they will reimburse.

IV. Responsibility

- A. Principal Investigator (PI) holds a number of responsibilities related to sponsored projects, the core of which is conducting the work for which external funding has been received. In addition to meeting technical requirements on a sponsored project, the PI also has administrative responsibilities such as assuring that expenditures are made for the intended purpose of the project and in accordance with sponsor requirements and local policy. The technical requirements involve submitting timely periodic and final narrative reports on the progress of the project and overseeing others who may contribute to the project, including VHF/VA employees, consultants, and subcontractors. The PI must oversee the proper reporting of Intellectual Property (i.e., patents, licenses, copyrights) and equipment. The PI must ensure individuals paid from their sponsored project are in compliance with the VHF Effort Reporting policies and that all expenditures are allocable and allowable under sponsor and local guidelines.
- B. The Grants and Contract Manager (GCM) supports investigators and staff in the acquisition, performance, and administration of projects and programs funded from external sources. Additionally, the GCM is responsible for reviewing and approving proposal submissions to external sponsors, ensuring the criteria for PI eligibility have been met in accordance with this policy.
- C. The Executive Committee will hear appeals to the decision made by the ED as to the eligibility of PI's to submit grant applications through VHF.

D. The Executive Director will review compliance with this Directive for all new projects and disapprove applications that are in violation of this policy.

V. REFERENCES

38 USC 7361-7368

VHA Handbook 1200.17

VAPHS Research Policy 021, Administration of Extramural Awards

VI. RESCISSION

First Issuance