

Office of Sponsored Programs  
Procedure 20003, Investigator Eligibility Requirements and Responsibilities  
Related to Sponsored Programs

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## 1. Introduction

### Responsible Officials:

Associate Vice President for Research and Innovation, Sponsored Programs

**Effective Date:** November 1, 2023

**IMPORTANT:** For federal awards/subawards issued to Virginia Tech with a start date prior to December 26, 2014, 2 CFR Part 215 (OMB Circular A-110) and 2 CFR, Part 220 (OMB Circular A-21) apply. For all new funds (new awards and new monies, such as continuation awards, supplements, etc. received for existing awards) with a start date on or after December 26, 2014, these new funds are subject to 2 CFR Part 200 (commonly referred to as Uniform Guidance—Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards) but hereinafter referred to as “2 CFR Part 200”).

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## 2. Scope

This procedure establishes institutional eligibility requirements and ongoing responsibilities of individuals holding the role of Principal Investigator (PI) on sponsored programs awarded to Virginia Tech and administered by the Office of Sponsored Programs.

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## 3. Procedure Statement

As the recipient of sponsored programs awards that support the activities of its faculty, Virginia Tech 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.

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#### **4. Reason for the Procedure**

This procedure establishes the eligibility criteria for being a PI at Virginia Tech and also provides guidance to request PI eligibility status if such status is not granted via the individual's appointment.

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#### **5. Definitions**

**Principal Investigator (PI):** PIs are individuals who play a significant role in the design, conduct, and 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 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. The PI is responsible for the fiscal management of the award which includes the direction of spending funds in accordance with the terms and conditions of the award. The PI is also responsible for all programmatic/technical reporting requirements as outlined in the award document.

Principal Investigator Eligibility Criteria: to be eligible to qualify for principal investigator status, an individual must demonstrate or possess the following:

- A doctorate or master's degree with substantial related experience
- Evidence of Scholarship
- Direct benefit to the University

**Co-Principal Investigator (Co-PI):** This individual has been designated by the university and the sponsor as a Co-PI and shares the responsibilities for the sponsored project with the PI. In addition to responsibilities for the administrative, compliance, and scientific and technical direction of a sponsored project, the Co-PI has fiscal authority and may oversee the spending of a sponsored project in accordance with its terms and conditions.

**Co-Investigator (Co-I):** As an investigator on a sponsored project, this individual is responsible for conducting research within the terms and conditions of the award and in accordance with the university policies and procedures.

**Institutional Base Salary (IBS):** IBS is the base annual compensation set by Virginia Tech for an individual's appointment, whether that individual's time is spent on research, instruction, administration, or other activities. It includes salary increments, augmentations/bonuses in lieu of a base increase, and paid overtime. It does not include extra service pay (i.e. honoraria, awards and overload payments).

Any individual who is granted PI eligibility may not be paid 100% on a sponsored project. The role of PI and its responsibilities to write proposals as part of their position is managed by OSP Institutional Base Salary (IBS) for [Sponsored Awards Procedure 10013](#). If an individual is granted PI eligibility, the writing of proposals is part of their IBS and cannot be paid from a sponsored project.

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## 6. Procedures

**Eligibility by Appointment:** In order to serve as a Principal Investigator for a sponsored project at the University, an individual must hold one of the following types of appointments: (1) a tenured appointment, (2) a tenure-track appointment, (3) a full time, fixed-term appointment as a member of the instructional and research faculty, (4) research scientist and senior research scientist, (5) senior research associate. A full list of those positions eligible by appointment may be found on the Office of Sponsored Programs [website](#).

**Eligibility by Exception:** An individual who is not eligible by appointment to serve as a Principal Investigator may request PI-eligibility by exception in accordance with this procedure and by completing the [Principal Investigator Status Request Form](#).

Categories of exceptions:

- An individual holding a certain type of appointment may serve as a Principal Investigator with the approval of his or her department head and Dean. A full list of these appointment types may be found on the Office of Sponsored Programs [website](#).
- Current employees in the following categories may request PI status:
  - Salaried employees who do not meet eligibility criteria based on their appointment.
  - Faculty on P-14 appointments: Faculty in a part time position paid on P-14 appointment may request to serve as PI or Co-PI for the effort expended on sponsored projects.
- Certain Non-Paid Affiliates: Non-paid affiliates with an HR approved P-86 appointment. Virginia Tech division of human resources governs the non-paid affiliate appointment process, using the [P-86 form](#).
  - Emeritus Faculty: Faculty granted emeritus status upon retirement by the Virginia Tech Board of Visitors may serve as PIs, subject to the approval of the department head and dean. The sponsor of the award will need to be made aware of the change in the PI's status and approve the individual remaining PI. If the emeritus faculty chooses to not be re-employed by the University to be paid for their effort, they will be required to certify their time and effort via a manual process rather than through the [Effort Reporting System](#) (ERS).
  - Faculty separating from the University: In most instances, when a PI separates from the University, the active awards for which they are a PI should either be transferred to the PI's new institution or transferred to another PI at Virginia Tech. Both changes must be requested from the sponsor via the Office of Sponsored Programs.

In very limited circumstances, a PI separating from the University may be granted PI eligibility status in such cases as

- The active award has an award end date within three months of the PI's separation date from the University with no intention to request an extension or modification to extend end date; or
- The sponsor makes a formal written request to the Office of Sponsored Programs for the award not to be transferred to the PI's new institution and for the PI who is separating from the University to remain the PI.

**Newly recruited incoming faculty:** A future employee who wishes to have PI eligibility prior to the start of their eligible appointment to facilitate a transfer of funded project(s) to Virginia Tech or to submit new proposals as an eligible Virginia Tech PI may do so without having to process the PI Status Request form. The PI or department administrative support staff should send the PI's executed offer letter to the appropriate [pre-award associate](#) prior to processing the proposal in SUMMIT proposals.

**Appeal Process:** An individual requesting PI status may appeal a decision made by the Associate Vice President for Research and Innovation, Sponsored Programs. They may request an appeal from the office of the Senior Vice President for Research and Innovation by using the [PI status request form](#). This process should include a meeting with the Associate Vice President for Research and Innovation, Sponsored Programs and either the Senior Vice President for Research and Innovation, the Senior Associate Vice President for Research and Innovation, or both.

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## 7. References

- [OSP Principal Investigator Eligibility website](#)
  - [Principal Investigator Status Request Form](#)
  - [Faculty Handbook](#) – Chapter 5, Chapter 6, Chapter 10
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## 8. Contacts

- Associate Vice President for Research and Innovation, Sponsored Programs
    - [pistatusosp@vt.edu](mailto:pistatusosp@vt.edu)
    - 540-231-5281
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## 9. Roles and Responsibilities

The Principal Investigator will:

- Foster ethical conduct, including by upholding research and professional integrity principles.
- Establish a safe and respectful research environment that complies with all applicable 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.
- Implement procedures to safeguard research data in compliance with sponsor requirements as well as applicable University policies, state and federal laws and regulations.

- Provide 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.
- Be knowledgeable of sponsor approval requirements regarding personnel, budgetary and programmatic changes to sponsored programs. Submit and receive 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.
- Submit accurate and complete technical reports and other non-fiscal reports to the sponsor on a timely basis.
- Notify and work 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 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).

**The Associate Vice President for Research and Innovation, Sponsored Programs:**

- Approve/Deny requests for exceptions for PI eligibility.

**The Office of Research and Innovation:**

- Hear appeals of exception requests for PI eligibility that have been denied.

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## 10. Dissemination

This procedure may be posted on a Virginia Tech internet accessible site. No public restrictions are noted.

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## 11. Approval and Revisions

This procedure was originally approved by the Associate Vice President for Office of Sponsored Programs, November 1, 2023.

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The official version of this information will only be maintained in an on-line web format.  
Any and all printed copies of this material are dated as of the print date.  
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