Policy Statement

As a condition of its acceptance of sponsored project awards from external sponsors, the UMass Medical School (UMMS) is obligated in its role as the recipient of the awards to ensure that only individuals meeting eligibility requirements may serve as principal investigator, multiple principal investigator, or program director on proposals. The Office of Sponsored Programs is responsible for ensuring that all proposals meet sponsor requirements and are institutionally reviewed and approved prior to submission. The UMMS policy on PI eligibility shall take precedence in instances where the sponsor’s requirements are less restrictive.

Reason for Policy

The purpose of this policy is to establish criteria permitting individuals to fulfill the role of principal investigator, program director or multiple principal investigator on a sponsored project; and to ensure that sponsored projects are conducted by those who have the requisite training, skill, commitment and resources as well as the appropriate relationship to UMMS. The policy also articulates the period of time and privileges available to Principal Investigators when they leave the institution.

Entities Affected By This Policy

This policy is applicable to all UMMS employees that seek to submit proposals and serve as Principal Investigator/Project Director on sponsored projects.

Related Documents

- Participation Agreement
Scope

This document applies to all individuals submitting proposals to external sponsors through the Office of Sponsored Programs seeking monetary or non-monetary support of a sponsored project which, if awarded to UMMS will be governed by a contract, grant, cooperative agreement or other binding agreement.

This policy does not apply to consultant agreements or the procurement of goods or services from vendors.

UMass Medical School Faculty & UMass Memorial Health Care Physicians with Medical School Faculty Appointments

Faculty within the academic ranks listed below must have 50% FTE or greater employment to be eligible to serve as PI/PD on sponsored projects:

- Professor
- Associate Professor
- Assistant Professor
- Instructor

PI Eligibility for Incoming (New) Faculty

Incoming faculty in the above categories with signed offer letters are considered PI/PD eligible and are allowed proposal submission privileges prior to their start date.

Departing Faculty

Departing faculty may receive an adjunct appointment to assist in their transition to a new institution, allowing them to retain PI/PD status on sponsored projects remaining at UMMS for a period of 12 months or less. No new sponsored project applications may be submitted through UMMS by these individuals.

UMass Medical Faculty with Veterans Administration (VA) Appointments

The type of UMMS faculty appointment a VA employee has will determine their PI eligibility.

UMass Medical School & UMass Memorial Health Care Affiliate Faculty and Volunteers

Affiliate faculty and volunteers are ineligible to serve as PI/PD on Medical School sponsored projects.

UMass Amherst, Boston, Dartmouth and Lowell Faculty

Faculty at the other UMass campuses may sometimes be allowed to serve as PI/PD of a UMMS proposal. Please reach out to the Office of Research if you encounter this situation.

Retired Faculty

Retired faculty are ineligible to serve as PI/PD on sponsored projects unless they receive an exception.
Adjunct Faculty

The term “Adjunct” shall precede the academic title of any non-UMMS, non-UMMHC salaried member of the faculty holding a primary appointment at another academic institution. Adjunct faculty are ineligible to serve as PI/PD on Medical School sponsored projects unless the individual has a less than 1.0 FTE appointment at their primary academic institution which allows them to provide effort on UMMS grants. In no instance can the combined faculty member’s FTE at the primary academic institution and Adjunct appointment at UMMS exceed 1.0 FTE.

Departing faculty that have been given adjunct appointments at UMMS as part of their transition to a new institution are allowed to retain PI status on grants remaining at UMMS for a period of 12 months or less in order to facilitate their departure. No new sponsored project applications may be submitted by departing faculty.

Visiting Faculty

Visiting faculty are ineligible to serve as PI/PD on UMMS sponsored projects.

Non-Faculty/Staff

For non-academic grant seeking units, employees with the title/rank listed below must have a 50% FTE greater employment to be eligible to serve as PI/PD on sponsored projects:

- Department Head
- Director
- Manager

Postdoctoral Associates (Postdocs) & Students/Trainees

Students & Trainees are not allowed to serve as PI/PD on sponsored projects, but may serve as PI/PD on projects specifically targeting Postdoctoral Associates & Students/Trainees including individual fellowships and career development grants for which holding PI/PD status is a requirement.

Exceptions Requests

Department Chairs, Program Directors, Department Heads may request an exception to the PI eligibility policy for otherwise ineligible individuals. Exception request procedures are identified in the Principal Investigator Eligibility Matrix on page 5 of the policy.

Responsibilities

Department Chair, Chief, Unit Head

1. Ensure that all proposal submissions contain an eligible individual as a principal investigator, multiple -principal investigator or program director and the eligible individual(s) has a signed participation agreement in place, and have the requisite training, resources and effort to devote to the proposed sponsored project.

2. Review and approve departmental proposal submissions.
3. Submit exception requests to this policy.

Office of Research

1. Review all proposal submissions to confirm eligible individuals are being proposed as principal investigator, multiple principal investigator or program director and have received the appropriate prior approvals.

2. Review exception requests to this policy and make determination to approve or reject requests.

Definitions

**Participation Agreement**: Agreement required for all Principal Investigators and any other covered individuals engaging in sponsored project activity that confirms and documents acceptance of the University of Massachusetts Intellectual Property Policy and assigns to the University all rights in any Intellectual Property in which the University asserts ownership.

**Principal Investigator/Program Director/Multiple Principal Investigator**: The individual designated by the UMass Medical School and approved by the sponsor to direct a project funded by an external sponsor. S/he is directly responsible and accountable to the Medical School and sponsor for the proper programmatic, scientific or technical conduct of the project, and its financial and day-to-day management.

The principal investigator is a critical member of the sponsored project team responsible for ensuring compliance with the financial and administrative aspects of the award. The principal investigator works closely with appropriate administrators within the Medical School to create and maintain necessary documentation, including both technical and administrative reports; prepare budget justifications; appropriately acknowledge external support of research findings in publications, announcements, news programs, and other media; and ensure compliance with other Federal and organizational requirements. It is expected that the principal investigator will maintain contact with the appropriate sponsor representative with respect to the scientific aspects of the project and the business and administrative aspects of the award.

**Adjunct Faculty**: An appointment for faculty who hold a primary academic appointment at another institution other than UMMS.

**Affiliate Faculty**: Voluntary members of the faculty who are not employed by UMMS or UMMHC.

**Visiting Faculty**: Faculty that hold an academic appointment at another institution and are at UMMS for a limited period.

**Postdoctoral Associate (Postdoctoral Trainee)**: Individual employed by UMMS holding a doctoral degree engaged in a temporary period of mentored research and/or scholarly training for the purpose of acquiring the professional skills needed to pursue a career path.

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**Approvals**

[Signatures and dates]

Chief Research Officer

Executive Vice Chancellor for Administration & Finance
# UMMS Medical School & UMass Memorial Health Care – Principal Investigator Eligibility Matrix

<table>
<thead>
<tr>
<th>Rank / Category</th>
<th>UMMS Faculty</th>
<th>UMMS &amp; UMMHC Affiliate Faculty</th>
<th>Retired &amp; Volunteer Faculty</th>
<th>Adjunct Faculty</th>
<th>Visiting Faculty</th>
<th>Non-Faculty/Staff</th>
<th>Postdocs, Residents &amp; Students/Trainees</th>
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<tbody>
<tr>
<td></td>
<td>Professor</td>
<td>Refer to ranks in UMMS Faculty column.</td>
<td>The term “Adjunct” shall precede the academic title of any non-UMMS, non-UMMHC salaried member of the faculty holding a primary appointment at another academic institution.</td>
<td>The term “Visiting” shall precede the academic title of any member of the faculty who continues to hold a primary appointment at another institution and whose appointment at UMMS is for a limited time.</td>
<td>For non-academic grant seeking units: Department Head Director Manager</td>
<td>N/A</td>
<td></td>
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</tbody>
</table>

| Eligibility       | Eligible if faculty with 50% FTE employment or greater. Incoming faculty in the above categories with signed offer letters are PI eligible and can submit proposals prior to their start date. | Not eligible to serve as UMMS PI. | Not eligible to serve as UMMS PI. | Not eligible to serve as PI, Co-I or Multi-I. | 50% FTE employment or greater to be eligible to serve as PI. | Postdocs, Students & Trainees are not allowed to serve as PI on research grants, but can serve as PI on projects specifically targeting these areas including on individual fellowships and career development grants for which holding PI status is a requirement. |

| Transition / Departure | 12 month or less transitional period. PI effort during transitional period limited to no more than 20% for all projects. Longer transitional periods will require approval of the Chief Research Officer or their designee. | N/A | UMMS & UMMHC faculty given adjunct appointments as part of their transition to a new institution can retain PI status on grants remaining at UMMS for a period of 12 months or less. | N/A | N/A | N/A |

| Exception Process   | IF < 50% FTE employment, approval needs to be requested through the Office of Research by Department Chair or Program Director. | Approval needs to be requested by Department Chair or Program Director through the Office of Research. | Approval needs to be requested by Department Chair or Program Director through the Office of Research. | Approval needs to be requested by Department Head / Program Director through the Office of Research. | Approval needs to be requested by Department Chair or Program Director through the Office of Research. |

| Approvals Required  | Chief Research Officer or designee | Chief Research Officer or designee | Chief Research Officer and Executive Vice Chancellor, Administration & Finance | Chief Research Officer or designee | N/A | Chief Research Officer or designee |

UMass Amherst, Boston, Dartmouth and Lowell Faculty may sometimes be allowed to serve as PI/PD of a UMMS proposal. Please reach out to the Office of Research if you encounter this situation.