Principal Investigator Eligibility Policy
Approved December 6, 2007 by UNLV Research Council

Background

The title of Principal Investigator (PI) identifies the individual responsible for the conduct of a sponsored project or non-sponsored project requiring registration with one or more UNLV compliance committees, including the Institutional Review Board (IRB), Institutional Biosafety Committee (IBC), Radiation Safety Committee (RSC), and Institutional Animal Care and Use Committee (IACUC). This responsibility includes the intellectual conduct of the project, fiscal accountability, administrative aspects, and the project’s adherence to relevant policies and regulations. For that reason, PIs must have a reasonable prospect of long-term employment at the University of Nevada, Las Vegas.

Automatic PI status

The policy of the University of Nevada, Las Vegas is that only full-time academic faculty members (as defined in the Board of Regents Handbook and UNLV Bylaws) may routinely serve as PIs. Certain other titles are allowed to serve as PIs within the limitations described below. Exceptions to this policy may only be made with the prior approval of the Vice President for Research and Dean of the Graduate College. The University will not submit proposals for external funding or approve requests requiring compliance committee oversight without adherence to this policy.

Full-time members of the academic faculty, for purposes of this policy, include the following personnel titles:

- Professor
- Associate Professor
- Assistant Professor
- Library Faculty
- Emeritus Faculty
- Research Professor
- Research Associate Professor
- Research Assistant Professor
- Center Directors

Whenever there is a question as to eligibility for automatic PI status, the applicable definitions in the Board of Regents Handbook (Title 4, Chapter 3, Section 2.1.a for academic faculty) and the UNLV Bylaws (Chapter 3, Section 18.4.4 for research faculty) shall apply. For the purposes of this policy Co-PI and Co-Investigator are synonymous.

Individuals not currently employed by UNLV

An individual who is not currently employed by the University of Nevada, Las Vegas can serve as a PI or a Co-PI on a project if a department chair or unit director and dean of the
unit in which the work will be conducted provides documentation that an appointment to one of the eligible titles listed above has been offered to and has been accepted by the individual.

**Graduate Students**

Graduate students typically cannot serve as a PI. Graduate students may not serve as PIs or Co-PIs for compliance committee protocols. In order to process a sponsored project for which a graduate student intends to act as key personnel, act as a Co-PI, or has the main responsibility for conducting the project, the following criteria must be met:

1. A full-time faculty member, who is eligible to be a PI, must serve as Faculty Advisor for the project.
2. The Faculty Advisor shall serve as Principal Investigator.
3. The graduate student shall be responsible for the intellectual conduct of the sponsored project within the oversight of the Faculty Advisor and may be named as the Co-PI in the submission to the funding agency.
4. The proposal to the funding sponsor may name the graduate student as Key Personnel, as long as the Faculty Advisor is named as the responsible individual (i.e., PI, Project Director or Faculty Advisor), unless that is specifically prohibited by the funding sponsor guidelines. In such cases, the graduate student, with the concurrence of the Faculty Advisor, may request an exception to this policy per the procedures described in this policy.
5. The proposal should acknowledge the student’s authorship as appropriate.

**Adjunct faculty and post-doctoral fellows**

PI status will not be granted to adjunct faculty or staff. Exceptions to this policy may only be made with the prior approval of the Vice President for Research and Dean of the Graduate College per the exceptions criteria described in this policy.

Individuals who are post-doctoral fellows, but who do not meet the personnel category requirements noted above, may obtain appointment as a PI by submitting an exception request to the Office of Sponsored Programs (OSP) or the Office of Research Integrity (ORI) as outlined in this policy. A UNLV Faculty Advisor or mentor must be listed as the Co-PI on requests to ORI and on fellowship awards, at least internally if such appointment is not permitted on the award by funding sponsor guidelines. The Faculty Advisor’s name, department and other pertinent information should be provided as part of the exception request.

**Exceptions**

Exceptions can be granted and PI status conferred on a case-by-case basis.
Deemed Exceptions: The Vice President for Research and Graduate Dean may deem that certain positions, other than those listed above, are granted PI status for the term of the position at UNLV.

Requested Exceptions: Non-tenure track faculty and professional staff involved in projects that contribute to the University’s mission may also request PI status from the Vice President for Research and Graduate Dean.

Requested Exceptions may be granted when the following conditions apply:
1. An application to serve as PI is to be submitted on the basis of a specific proposal idea or concept. Approval to be PI is granted for a specific proposal idea only, and should not be construed to permit the applicant to submit other proposals for unrelated ideas or concepts.
2. The individual must have the necessary experience and independence to compete for his or her own sponsored program and/or to administer the project. They must have previous experience with similar types of research projects and the ability to comply with all requirements of the award or project.
3. The individual must obtain written commitments of sponsorship from the department chair/unit director and dean, and any other individual required to guarantee necessary laboratory space or other resources or support.
4. The department chair/unit director and dean must agree to assume responsibility for the awarded sponsored program should the individual leave UNLV.

Procedure for requesting an exception

Requests for PI eligibility for sponsored projects should be directed to the OSP prior to the submission of a proposal to permit adequate time for review of the request. Requests for PI eligibility for compliance committees should be directed to the ORI. The request must be in the format required by the OSP or ORI and include written (or emailed) approval by the proposed PI’s chair or unit director and dean prior to submitting to either OSP or ORI. The request must also include the curriculum vitae of the proposed PI. OSP or ORI will forward the request to the Vice President for Research and Graduate Dean (or designee) for approval and will inform the proposed PI of the decision.

Decisions

Serving as a PI at UNLV is a privilege and responsibility, therefore the ultimate decision regarding PI eligibility exceptions rests with the Vice President for Research and Dean of the Graduate College (or designee in his/her absence). No other individual on campus can designate PIs. PI eligibility status for deemed or granted exceptions may also be revoked by the Vice President for Research and Dean of the Graduate College at his or her discretion.

Revised December 14, 2010