

Principal Investigator Eligibility Policy

Background

The title of Principal Investigator (PI) or Co-Principal Investigator (Co-PI) identifies the individual responsible for the conduct of a sponsored (funded) research project or non-sponsored (non-funded) research project. This responsibility includes the intellectual and day-to-day conduct of the project, fiscal accountability, administrative aspects, and the project's adherence to relevant policies and regulations.

Faculty, staff, and students engaging in approved research activities do so on behalf of the University of Nevada, Las Vegas (UNLV). As such, the University is responsible for adequate oversight of approved research and/or other scholarly activities. This policy is in place to facilitate the quality and continuity of oversight of research and/or other scholarly activities by PIs. UNLV will not submit proposals for external funding or review requests requiring compliance committee oversight without adherence to this Policy.

Who may serve as a PI?

UNLV policy is that only permanent/prospective long-term Full-Time Equivalent (FTE) academic and administrative faculty members (appointments at 50% FTE or more) and emeritus faculty may serve as automatic PIs.

All student research projects must be under direction of a faculty advisor who is listed as the PI on the study. Students engaged in thesis or dissertation projects must follow the Graduate College Handbook requirements for Graduate Advisory Committee (GAC) composition which indicates the GAC chair will be the PI.

Exceptions

If one does not qualify for automatic PI status as outlined in this Policy, an exemption may be requested by electronically submitting a PI Eligibility Request Form, PI Eligibility Exception Assurance, and curriculum vitae (CV) or resume of the proposed PI. The forms must designate one's dean/chair or PI designee as a Legacy Co-PI for continuity purposes. This is to ensure audit compliance beyond the close out period and required record retention.

When a PI is approved under an exception, they are eligible to lead research activities at UNLV and may submit a protocol for specific research (Office of Research Integrity or Office of Clinical Trials) or funded project proposal (Office of Sponsored Programs).

Approval of PI eligibility is valid in perpetuity until position/title change, separation from UNLV, or as per the indicated expiration date on the PI Eligibility Request Form.

All forms and attachments must be submitted as one complete pdf file to PIE@unlv.edu.

Decisions

Serving as a PI at UNLV is a privilege and responsibility, therefore the ultimate decision regarding PI eligibility exceptions resides with the Vice President for Research (or designee in their absence). No other individual on campus is allowed to provide this designation and exceptions may also be revoked by the Vice President for Research at his/her discretion.

Compliance & Education Requirements

Conflict of Interest (COI) Disclosure/Outside Activities - All individuals acting as PIs, must complete an annual COI Disclosure and Outside Activity Request Forms prior to engaging in the outside activity(s).

CITI Program Education - All individuals acting as PIs engaging in research activities requiring human subject participants, clinical trial patient engagement, or animal research must possess up-to-date CITI Program certification prior to submitting a protocol for review through the Office of Research Integrity or Office of Clinical Trials.

Volunteer Compliance - All volunteer Individual Investigators (e.g. community faculty), who receive no monetary benefits in return for the volunteer service, must complete a Volunteer Agreement, Individual Investigator Agreement, and must list a Co-PI on every protocol or grant proposal submission.

Record Retention

As per federal regulations, a record of all approved PI Eligibility Request Form and PI Eligibility Exception Assurance must be retained at the School/College level for a minimum of three years following completion of the research (45 CFR 46.115 (b)).

Related Links

CITI Program

Individual Investigator Agreement

PI Eligibility Exception Assurance

PI Eligibility Request Form

UNLV Graduate College Handbook

Guidelines on Pre-Approved Activities

Volunteer Agreement

Table 1: PI/Co-PI Eligibility by Employment Category:

	Automatic	Complete PI Eligibility Request Form, PI Eligibility Exception Assurance	Volunteer & Individual Investigator Agreements, & must
	Automatic	(designating Legacy Co-PI),	list Co-PI on all proposals and
Status/Title	PI Eligible	and submit CV/resume	protocols
Tenure/Tenure Track Faculty	X		
Assistant/Associate/Full Professors	X		
Faculty-in-Residence	X		
Administrative Faculty (non-academic appointment)	X		
Emeritus Faculty	X		
Visiting Scholars/Professors		X	
Any position funded by a Letter of Appointment (LOA)		X	
Postdoctoral Fellows		X	
Volunteer Individual Investigators (e.g. community faculty)		X	X

Checklist #1: <u>Automatic PI Eligible</u> (Tenure/Tenure Track Faculty, Assistant/Associate/Full Professors, Faculty-in-Residence, Administrative Faculty (non-academic appointment) and Emeritus Faculty):

- Complete a COI Disclosure (gathered annually);
- Complete Outside Activity Request Form(s) if participating in any outside activities that are not listed on the Guidelines for Pre-Approved Activities list (to be completed prior to participating in outside activities); and
- Complete any applicable CITI Program course(s) (Refer to the Compliance and Education Requirements section of this Policy)

Checklist #2: Not automatic PI Eligible (Visiting Scholars/Professors, any position funded by a Letter of Appointment (LOA), Postdoctoral Fellows, and Volunteer Individual Investigators):

- Complete a COI Disclosure (gathered annually);
- Complete Outside Activity Request Form(s) if participating in any outside activities that are not listed on the Guidelines for Pre-Approved Activities list (to be completed prior to participating in outside activities). This does not apply to Volunteer Individual Investigators (UNLV employees only);
- Complete any applicable CITI Program course(s) (Refer to the Compliance and Education Requirements section of this Policy);
- Complete a PI Eligibility Request Form and PI Eligibility Exception Assurance designating a Legacy Co-PI, and submit along with the CV/resume of the proposed PI to <u>PIE@unlv.edu</u>; and
- In addition, Volunteer Individual Investigators (only):
 - Complete a Volunteer Agreement and Individual Investigator Agreement, and must list a Co-PI on every protocol or grant proposal submission