Principal Investigator Eligibility

The policy of Cornell University is that only full-time faculty members may routinely serve as Principal Investigators or Project Directors on sponsored programs. Certain other titles are allowed to serve as Principal Investigators as described under Special Conditions below. Exceptions to this policy may only be made with the prior approval of the Senior Vice Provost for Research through the PI Form 5 application. Proposals for external funding will not be submitted by the University if they do not comply with this policy.

Full-time members of the faculty, for purposes of this policy, include the following titles:
Professor
Associate Professor
Assistant Professor
University Professor
Senior Scientist
Senior Scholar
Research Scientist
Principal Research Scientist

RATIONALE

The intent of this policy is to ensure that the responsibilities and authority vested in the role of Principal Investigator are reserved for full time members of the University Faculty. Responsibility for setting the direction of Cornell research rests squarely with the Faculty, who are primarily responsible for the quality of the research and the reputation of the University. Cornell's research directions are charted by University Faculty with a view towards their impact on the education of undergraduate and graduate students. In this sense, research is an integral part of Cornell's educational mission. Faculty whose appointments include public service obligations are held similarly accountable for the direction of outreach and extension activities in order to preserve the public trust. And, because of the significant degree of authority vested in the Principal Investigator relative to a wide range of administrative matters, including the allocation of human, financial, and facility resources, the responsibilities of being Principal Investigator must be primarily reserved to the Faculty.

DEFINITIONS

Principal Investigator (PI): This title identifies the individual responsible for the conduct of the 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. The presence of more than one identified PI on a project diminishes neither the responsibility nor the accountability of any individual PI.
**Co-Principal Investigator**: This designation refers to individuals who share the responsibility for the project with the Principal Investigator and therefore requires the same qualifications.

**Co-Investigator**: This title designates key personnel for a project, but without the oversight responsibility of a Principal Investigator. Individuals do not need to meet the qualifications of PI under this policy, but should be considered key to performance of the project.

**Project Director**: This title is a synonym for Principal Investigator on non-research sponsored programs or for "program-project" grants.

All of the above titles are recognized as having official responsibility for the sponsored program. Sponsors generally will require approval of their substitution.

**SPECIAL CONDITIONS**

Persons with the following titles are authorized to be Principal Investigators within the identified limitations as determined by the department/center, or the college, in which the person is appointed:

**Senior Research Associate**: Limited to research projects related to an individual's official duties.*

**Senior Extension Associate**: Generally limited to cooperative extension, training, and public service projects related to the individual's official duties.* Where a Senior Extension Associate is a Principal Investigator for a research project the department chair signature on the Form 10 will certify the department's determination that the project is related to their official duties.

**Senior Lecturer**: Limited to scholarly projects related to an individual's official duties* under his/her respective college's policy guidelines (which are approved by the Senior Vice Provost for Research).

**Librarian or Associate Librarian**: Limited to projects related to an individual's official duties* and which will enhance the mission of the libraries.

**Director, Johnson Museum of Art**: Limited to projects related to the individual's official duties* and which will enhance the mission of the Museum.

**Emeritus Faculty**: Participation as a Principal Investigator is conditional on the availability of departmental resources as determined by the department chairperson or center director. **"Official duties"** means those duties specified at appointment or subsequently modified in writing.

**STUDENT-INITIATED PROJECTS**

Certain sponsored programs have as their purpose the support of postdoctoral, graduate, (and occasionally undergraduate) education or research through student-initiated projects, (e.g.,
doctoral dissertations, predoctoral, postdoctoral research fellowships). For these sponsored programs, the following conditions apply:

1. A full-time faculty member, as identified above, must serve as Faculty Advisor.
2. The Faculty Advisor shall retain the responsibilities of a Principal Investigator under this policy.
3. The postdoctoral associate or fellow, graduate, or undergraduate student shall be responsible for the intellectual conduct of the project within the oversight of the Faculty Advisor.
4. The proposal to the sponsor may name the postdoctoral, graduate, or undergraduate student as Key Personnel, as long as the Faculty Advisor is named as the responsible individual (i.e., Principal Investigator, Project Director or Faculty Advisor). If required by the sponsor, the student may be named as PI. The proposal should acknowledge the student's authorship of the proposal, as appropriate.

REQUESTING EXCEPTIONS TO THIS POLICY

Individuals holding academic appointments not covered by this policy may serve as Principal Investigator upon request to the Senior Vice Provost for Research. A request for exception to this policy should be made using the Office of the Vice Provost for Research Form 5, Application to Serve as Principal Investigator/Project Director (see link at the end of this policy statement), and will be considered under the following conditions:

1. To serve as a PI, a PI Form 5 application is to be submitted on the basis of a specific proposal idea or concept. If the same proposal is to be submitted to more than one sponsor, this should be made clear in the application request to the Senior Vice Provost for Research and the sponsors should be identified. If approved, the applicant may submit proposals to multiple sponsors without additional approval from the Senior Vice Provost for Research. 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 different ideas or concepts, i.e., "blanket" approvals are not granted.
2. The individual must have the necessary experience and independence to compete for his/her own sponsored program and to administer the project should it be funded, as judged by the faculty sponsor, the department chairperson and center director, if applicable.
3. The individual must obtain written commitments of support from the department chairperson or center director, and any other individual required to guarantee necessary lab space or other resources or support.
4. The applicant's unit must be able to fund the effort required to prepare and submit proposals. Since time spent writing proposals cannot be charged to sponsored research accounts, with limited exceptions that require specific approval from the sponsor, and since, under current federal regulations, it is not allowable for investigators to write proposals in their "free time," e.g., during evenings and weekends, if the salary of a full-time Cornell employee is paid 100 percent from sponsored funds, that individual cannot
receive University permission to write and submit proposals. A minimum of 5 percent of the applicant's annual salary, for the year in which the proposal is prepared, must be paid from non-sponsored, unrestricted funds; more if multiple proposals are intended to be submitted per year.

5. The department chairperson or center director and a specifically identified faculty member (faculty sponsor) must agree to assume responsibility for the awarded sponsored program should the individual leave Cornell or otherwise be unable to complete the proposed project. A plan should be developed for administering the sponsored program in this case and should, at a minimum, include the identification of a specific individual who will assume the responsibilities of PI, and whether or not the project will stay at the University.

6. PI Form 5 applications to serve as Principal Investigator shall be submitted to the Office of the Vice Provost for Research should be received five (5) working days prior to any required proposal submission date. Note that the PI Form 5 application must be approved by the dean before being transmitted to the Senior Vice Provost for Research.

OTHER ACADEMIC TITLES

Titles modified with the terms of "acting", "adjunct", "courtesy", or "visiting" do not confer the right to serve as a Principal Investigator. When these modifiers are used, special one-time approval for a specific project and duration may be provided under the Exceptions provision. Since "visiting" and "courtesy" appointments are for individuals whose primary responsibilities rest outside the university, these modified titles would require exceptional justification. Research Associates, Lecturers, or Senior Assistant Librarians may be designated as temporary Principal Investigators to oversee an existing funded project while the authorized PI is away on leave or extended travel without formal approval from the Senior Vice Provost for Research. The normal approval of the department, OSP, and the sponsor is sufficient.

NON-ACADEMIC TITLES

When a sponsored program will be administered by a non-academic unit, or when the PI will serve in an administrative role only, the Senior Vice Provost for Research may approve an appropriate non-academic staff member to serve as Principal Investigator/Project Director. It is expected that the staff member proposed by the unit will be a regular full-time exempt employee with managerial or supervisory responsibilities.

NON-SPONSORED PROJECTS

For internal grant programs (i.e., project grants from institutional rather than external funding sources) the application of this policy shall be left to the discretion of the Director of the respective grant program, although this policy's rationale must be considered.
CONFLICT OF INTEREST DISCLOSURE STATEMENT

As a matter of Cornell University policy and federal regulation, it is required that Principal Investigators and key personnel on sponsored projects must have completed a "Disclosure of External Interests and Time Commitments" form, also known as the "annual disclosure statement." The disclosure form may be obtained from the Designated Representative in each college or unit or by contacting the Office of the Vice Provost for Research and/or the Office of the Dean of Faculty. The Cornell University Conflicts Policy is available from: https://www.dfa.cornell.edu/policy/policies/conflicts-interest-and-commitment-excluding-financial-conflict-interest-related.

RECOGNITION OF AUTHORSHIP IN PROPOSALS

The title of Principal Investigator is primarily a designation of institutional responsibility for the conduct of a sponsored program. As such, the title does not necessarily represent the principal authorship of the proposal document. The Cornell Code of Academic Integrity applies to sponsored program proposals. Therefore, it is important that authorship is appropriately attributed in all proposal documents. This attribution may be handled in any number of ways; the most common ways are described here:

1. If the authors are all listed as Principal Investigator, Project Director, Co-Principal Investigator, or Co-Investigator, no further action is necessary.
2. If the proposal has been prepared on forms provided by the sponsor, such as those of a governmental agency, the authors may be identified in the Personnel section of the narrative, or as a footnote to the narrative.
3. If the proposal has been prepared without forms provided by the sponsor, as may be the case with a foundation or corporate sponsor, the authors may be identified on the cover page, or by using the methods described above.