

Principal Investigator (PI) Eligibility Policy

Policy Statement: The Research Foundation for the State University of New York (RF) at Stony Brook University (SBU) is committed to ensuring compliance with sponsor requirements and applicable regulations for sponsored programs. This policy outlines the eligibility criteria and responsibilities for Principal Investigators (PIs), Co-Principal Investigators/Co-Investigators (Co-Pis/Co-Is), and Multiple Principal Investigators (MPIs) involved in sponsored programs.

All proposals in support of sponsored programs require approval of the Chair and/or Center Director and the Dean (or their designee) before submission to the sponsor. These approvals acknowledge that the investigator has the necessary skills and authority to perform the proposed work, that appropriate facilities and effort will be made available by the department and school/college, and that project and budgetary oversight will be provided.

In addition to the requirements in this policy, eligibility to serve as PI for any specific award must be in accordance with sponsor terms and conditions.

1. Definitions

Principal Investigator (PI): An SBU employee responsible for the scientific, technical, and administrative conduct of a sponsored program. This includes managing financial matters and ensuring compliance with relevant policies. A PI leading a training or public service project may also be called a Project Director or Project Administrator.

Co-Principal Investigator/Co-Investigator (Co-PI/Co-I): A faculty or non-faculty investigator sharing responsibility for the project with the PI. *Co-Pis/Co-Is who are SBU employees must meet the same eligibility requirements as PIs.*

Multiple Principal Investigators (MPIs): Multiple PIs who share equal responsibility for leadership in multidisciplinary or team sponsored programs.

Sponsored Program: Any externally funded research, public service, or training and educational activity at the University, which has a defined scope of work including specific and clearly defined programmatic objectives and deliverables, along with a budget that outlines sponsor expectations and awardee accountability. Sponsored programs are funded through grants or agreements that typically include terms and conditions governing the disposition of both tangible properties (e.g., equipment, records, technical reports, theses, or dissertations) and intangible properties (e.g., rights in data, copyrights, and inventions). Note: The terms sponsored program, sponsored project, and/or sponsored activity are often used interchangeably.

2. Eligibility Criteria

While any appointed faculty member is eligible to submit proposals, they may serve as a PI on an sponsored program only if, at the time the award is established, they hold a ***paid, active SBU appointment. This appointment, whether permanent, renewable or term-limited, must align with the expected duration and level of time/effort committed to the sponsored program(s).*** Eligibility must be documented in myResearch Grants during proposal development, review, and internal approval.

2.1 Automatically Eligible:

- Faculty members with titles such as Assistant Professor, Associate Professor, Professor, Distinguished Professor, Clinical Professor, Research Assistant Professor, Research Associate Professor, Research Professor, and Librarian (Assistant, Associate).
- University administrators in leadership roles who must identify appropriate reporting structures (e.g., Director, position classification MC3 or higher).

2.2 Eligible with Prior Approval:

- Academic appointments such as Adjunct Professor, Lecturer, Instructor, Visiting Professor (Asst., Assoc.), Toll/Emeritus Professor* require prior approval from their Department Chair, Center Director or authorized unit leader.
- Research staff and students employed by the RF or SBU, whose primary responsibility is to carry out research but who do not have a faculty appointment (e.g., postdoctoral trainee, research associate, fellow, (senior) research scientist) need prior approval from their Department Chair, Center Director, and Dean (or Dean's designee) or the appropriate senior leadership of other University units.
- University employees without a faculty appointment who wish to serve as a PI on a sponsored program require prior approval from their respective Dean/Provost/VP, and may also require OSP approval to be granted PI role in myResearch Grants.

NOTE: Prior approval may be granted during the myResearch proposal routing by the respective Department Chair, Center Director, Dean (or Dean's designee) or the appropriate senior leadership linked to the unit designation. This approval cannot be delegated. It is important that the appropriate PI title is selected in the application (question 2 under the myResearch Grants Proposal Description & Contacts Smartform).

Individuals who do not have a faculty appointment at the time of proposal submission, but expect to have an appointment at the time of award, are permitted to be listed as PI if there is a written statement from the appropriate Chair or Dean, prior to submission

and included in the myResearch proposal, indicating that faculty appointment will be completed by the time the award is made.

* Emeritus Professors in a PI or CoPI role need to obtain an institutional appointment from their respective Chair for the period for which the award is active. This appointment can be less than 100% and as small as 1%, but has to be for the time period of the project and has to represent at least the percent of effort on the sponsored program.

3. Responsibilities of the PI

- **Management:** Ensure sound management of the project, including adherence to research integrity principles, professional standards, and compliance with all regulatory requirements. The PI has the full authority for the administrative, scientific, technical, and financial management of sponsored programs, including compliance with SBU, Research Foundation (RF), and sponsor policies.
- **Oversight:** Oversee the research or supported activities design, conduct, and submission of technical reports or deliverables, ensuring compliance with both University and sponsor policies and requirements. Submit human subjects studies for Institutional Review Board (IRB) review and approval. Sign protocol-related forms for submission to the Institutional Animal Care and Use Committee (IACUC), ensuring that all protocols related to the use of human and animal subjects are strictly followed. Adhere to occupational and lab safety protocols to ensure a safe research environment.
- **Disclosure: Conflict of Interest/Commitment:** Maintain a complete and accurate Disclosure Profile by submitting an annual certification and updating within thirty (30) days of any new activity. See the [External Interests and Commitments Policy](#) and the [University and Sponsor Disclosure Requirements website](#) for additional information.
- **Export Control:** Ensure compliance with all relevant export control regulations, including obtaining necessary licenses for the transfer of controlled research materials or information outside the United States.
- **International Activities:** Comply with SBU's International Activities Policy, which governs research and collaboration with international entities, and ensure that all international research activities, including travel, adhere to the necessary regulatory requirements and risk assessments as outlined in the policy.

4. Compliance and Non-Compliance

- **Proposal Submission:** PIs are not authorized to submit proposals directly to sponsors without OSP approval, or accept an award/sign agreements on behalf of the University. Any negotiations associated with an award must be conducted by OSP. Pre-proposals may not require OSP's endorsement, but PIs are still required to share their applications or intent to submit with OSP.
- **Consequences:** Failure to comply with SBU, RF, or sponsor policies may result in adverse actions including, but not limited to, unfavorable reviews, denial of funding, additional documentation requests, delays, and potential negative impact on both the award and the institution's reputation.

5. Internal Funding and Limited Submissions

- **Internal Funding:** University internal funding opportunities, such as Research Seed Awards, have eligibility and conditions requirements distinct from those of sponsored programs. Specific guidelines for such opportunities are provided in each funding announcement. Applicants must consult these guidelines to ensure they meet all criteria.
- **Limited Submissions:** The University utilizes an internal selection process to identify and fairly judge among numerous investigators interested in submitting applications for sponsored projects that limit the number of proposals originating from the University. The [Office of Proposal Development](#) manages the identification, communication and internal selection processes for all limited submissions.

6. Special Considerations

- **Graduate Students/Postdoctoral Trainees including Residents:** May be granted limited PI status under the direction of a faculty advisor for the purpose of submitting funding proposals and receiving funding to support their work. Campus policy requires graduate students to apply for grants under the direction of an advisor who holds a faculty appointment. The faculty advisor is the PI/PD and the student is the co-investigator internally, even if the sponsor requires that the student be listed as PI/PD on the grant application. The title of the research will be, for example, "Fellowship Research for...(student name)...in the study of....," or "Dissertation Improvement Grant for...."
- **BNL scientists with formal SBU affiliations (e.g., adjunct or voluntary appointments):** The eligibility to serve as PI, Co-PI, or key personnel on SBU proposals will be determined case by case until a formal policy is established. At a minimum:

- Combined effort across BNL and SBU cannot exceed 100%.
- An eligible SBU faculty member must be included as PI or Co-I.
- BNL supervisor approval is required, confirming availability of necessary BNL resources/facilities.
- **Departing Faculty:** Tenure-track faculty may serve as PI for up to 24 months after leaving their position at SBU, with the appropriate approvals in place from their respective Department Chair, Center Director, and Dean, in order to allow them to engage in award closeout activities (e.g., final technical reports, approval of subcontractor invoices, disposition of property) and to mentor project-supported graduate students. See [PI Leaving SBU](#) page for more information.
- **Incoming Faculty:** Faculty who are joining SBU may wish to transfer in sponsored programs. See [PI Joining SBU](#) page for more information. If the new faculty member has not yet signed their offer letter, they are ineligible to submit as an SBU PI. If the new faculty member has already signed their offer letter, the unit should obtain an SBU NetID by creating a courtesy affiliate in PeopleSoft.
- **Non-U.S. Residents/Non-Immigrant Investigators:** Must meet sponsor requirements and have appropriate visa status. In cases where the sponsor requires U.S. Permanent Residence (green card) or U.S. citizenship for application these requirements must be met. Contact the Office of International Academic Programs and Services for information on obtaining the appropriate non-immigrant status for participation on a particular project. Additional information on immigrant and non-immigrant statuses in the United States may be obtained by contacting [Visa and Immigration Services](#) at 631-632-4685.
- **Outside Collaborators:** Non-SBU personnel cannot be listed as Co-PIs but can be recognized through collaborative proposals, subawards or consultancies.

7. Faculty Leave of Absence and PI Status

A Leave of Absence/ Leave Without Pay (LWOP)/ Unpaid Time Off by a faculty member during the academic year requires approval by the Chair/Director, Dean and Provost. Details on Title F Leaves, Appointments at Other Institutions or other leaves can be obtained by contacting the [Provost's Office](#). Faculty members on a full leave exceeding three months may not retain Principal Investigator (PI) status during their absence. Per the Uniform Guidance—an authoritative framework for grants management for federal awards—prior approval is required if the approved project director or PI experiences “disengagement from the project for more than three months, or a 25% reduction in time devoted to the project.” Contact OSP for guidance on the impact of leave on sponsored programs.

8. Multiple PIs

In instances where funding agencies recognize only one Principal Investigator (PI), the University will align with this practice. When multiple names are listed on the proposal, the first name will be assumed by the agency to be the **primus inter pares** (first among equals), and the University will direct all administrative correspondence to that individual, recognizing them as the PI. This person will be responsible for overseeing the project and maintaining communication with both the funding agency and University administrative offices.

For proposed projects involving subcontracts or sub-grants, the PI for the sub-recipient institution may be listed as a Co-Principal Investigator (Co-PI) on the SBU proposal. This designation allows for collaborative oversight of the project while ensuring the primary PI maintains overall responsibility.

For collaborative research, whether within SBU or spanning multiple institutions, where funding agencies recognize Multiple PIs - such as under the National Institutes of Health (NIH) Multiple Principal Investigator/Project Director (PI/PD) model - the University requires the proposal to include a project leadership plan, as requested by the sponsor. In this model, one investigator must be designated as the **Contact PI**. The Contact PI holds several key responsibilities, including:

- **Communication:** Relaying all communications between the Multiple PIs, funding agency, and SBU administrative offices.
- **Coordination:** Receiving and coordinating all correspondence with both internal administrative offices and external sponsors.
- **Internal Approvals:** Ensuring that all required internal approvals between administrative offices and sponsors are procured in a timely manner.
- **Disclosure and Compliance:** Identifying investigators required to disclose financial interests and managing all internal financial and personnel matters related to the project.

The Contact PI plays a pivotal role in ensuring the smooth operation and compliance of the project, while the collaborative structure allows for multiple investigators to contribute to the research effort. The NIH specifies that being named Contact PI does not imply any particular role within the leadership team beyond being responsible for communication. In the event of an apparent conflict between policies of the University and the funding agency, the more restrictive policy shall be followed.

9. Suspension of PI status

In rare instances, PI status may be suspended. Serious or recurring noncompliance with laws, policies or regulations may result in the Vice-President for Research (VPR) or their designee's recommendations to suspend or remove PI status.. This may include, but not limited to, violations related to human research participants protection, animal research, unreported external activities, harassment, or other inappropriate behavior. Such decisions will be reported promptly to the affected PI, their department chair, their college associate dean for research and appropriate Office of the Vice President for Research units. Reinstatement may be considered upon written request by the PI or by unilateral action of the VPR or their designee.