

## NYU Policy on Principal Investigator/Project Director Status

Updated 3.11.21

This policy applies to investigators in New York. It also applies to faculty at NYU global sites and at NYU Abu Dhabi and NYU Shanghai wherever any sponsored program is managed or administered by NYU's Office of Sponsored Programs. The policy does not apply to investigators at the Robert I. Grossman School of Medicine or the Long Island School of Medicine.

### 1. Statement of Policy

The University (NYU) is the applicant of record for Principal Investigators/Project Directors (PIs/PDs) who propose, submit, and conduct sponsored research, training, or other sponsored activities on behalf of NYU, utilizing NYU facilities and resources. (For information on PIs versus PD's, see the [NYU Policy on Academic Conflict of Interest and Conflict of Commitment, Addendum.](#))

NYU is the party that is bound to any terms of agreement in undertaking the activity, and NYU is responsible for proper stewardship, performance, and administration of the sponsored project. The named PI/PD on a specific project is responsible to NYU for ensuring that NYU meets its obligations to sponsors for the design, conduct and reporting of research and other sponsored activities (see the [Sponsored Research Guidelines](#)). As such, the PI/PD bears primary responsibility for day to day performance and fiscal management of the project.

All applications to and awards from extramural sponsors must follow University policy. These applications and awards are also subject to policy and eligibility criteria from the sponsor.

### 2. Who May Serve as a PI/PD

- a) Tenured/Tenure Track Faculty. NYU faculty with full-time, tenured or tenure-track appointments may serve as PIs/PDs.
- b) Continuing Contract faculty. NYU Continuing Contract faculty may serve as PIs/PDs consistent with the PI/PD status that is conferred on Continuing Contract Faculty who seek external funding for activities relevant to their instructional roles, including training projects and related activities. To be eligible to serve as PIs in sponsored research, see the policy on [Continuing Contract Faculty as Principal Investigators of Sponsored Projects and Programs](#).
- c) Honorific Research Faculty. Employees who also hold faculty titles (i.e. Research Assistant Professor, Research Associate Professor, Research Professor, etc.) may serve as PIs/PDs. (See the [Policy on Professional Research Personnel](#).)
- d) Professional Research Personnel. Employees with professional research titles (Assistant Research Scientist, Associate Research Scientist and Senior Research Scientist, etc.) are eligible to serve as PI's/PD's for sponsored projects if the Office of Sponsored Programs determines they meet the Standards and Conditions set forth herein, and if recommended by the department chair, endorsed by the responsible Dean or divisional Director, and approved by the Vice Provost for Research or designee. (See the [Policy on Professional Research Personnel](#).)
- e) Emeriti and retired faculty. With the approval of the responsible department chair and dean or division head and subject to sponsor eligibility criteria and/or approval, retired faculty on whom the emerita/emeritus title has been formally conferred and who would have qualified as a PI/PD

prior to retirement may continue to serve as PIs/PDs on existing awards and on proposals that were submitted prior to retirement. Requests from emeriti faculty to serve as PI/PD on new proposals or projects that are initiated after retirement will be considered on an individual basis, subject to the Standards and Conditions in this policy and subject to sponsor eligibility criteria, and will require the prior written approval of the Dean and the Vice Provost for Research, or designee. Retired faculty who do not have emeriti status and who would have qualified to serve as PI/PD prior to retirement are eligible to serve as Co-Investigators.

All Emeriti and retired faculty serving as PI/PD or Co-PI/Co-PD should be appointed as part-time with a job profile of "Visiting Professor (PT)" with an institutional base salary approved by the responsible department chair and dean or division head, with time and effort commitments across sponsored projects not to exceed 49%. For those who hold emeritus rank, the job title and business title can be "Professor Emeritus." For all others it should be "Visiting Professor." Note that Emeriti and retired faculty are the only individuals with part-time status who are eligible to serve as PI/Co-PI.

### **3. Standards and Conditions for Conveying PI/PD Status**

The following Standards and Conditions govern determinations regarding PI/PD status for individuals who do not have PI/PD status. These terms are intended to ensure on-going responsibility for programmatic, financial, and regulatory compliance requirements:

- a) The proposed research or project is congruent with the interests of the department.
- b) The applicant has sufficient stature to compete for external funding with a reasonable possibility of success.
- c) The applicant is a paid, full-time employee (or will be when an award is received). For retired or emeriti faculty, see section 2e above. Also note that for retired or emeriti faculty, an employed Co-PI must oversee participation of students/postdocs to ensure commitment to academic progress.
- d) The applicant will hold no conflicting appointments within or outside NYU. A full disclosure of outside interests and activities is required by all Investigators in accordance with the [NYU Policy on Academic Conflict of Interest and Conflict of Commitment, Addendum](#). If a review of disclosed outside interests or activities determines that an actual or apparent conflict of interest exists, the PI/PD will abide by the terms of a conflict management plan put in place by their School Dean.
- e) The employee expects the employment relationship with the department or institute to continue for the life of the project. If not, see (m) below.
- f) The applicant will be involved in the sponsored project in a significant manner. Primary responsibility may not be re-delegated explicitly or implicitly to individuals who do not qualify, and have not been approved, to serve as PI/PD. PIs/PDs engaged in Federally funded activities must commit to a minimum of one percent effort, whether or not that effort will be charged to the sponsor, except for certain activities where a sponsor may not expect a specific commitment of professional effort, e.g., conference and symposia, equipment, and training projects.
- g) Opportunities for the participation of students and/or postdocs will be maximized and protected.
- h) Any involvement by postdoctoral associates and fellows will be fully supported. (See [Postdoctoral Appointments Policy for NYU Washington Square.](#))

- i) There will be sufficient capital resources to undertake the project, including equipment and space, and/or award funds to replace these and other departmental expenditures, including compensation for laboratory and support personnel, such as technicians and administrative staff. (If incremental, such project costs should not adversely affect existing faculty resources.)

As part of these Standards and Conditions, the department chair and the Dean, or his or her representative, will assume the following obligations:

- j) Will ensure that the applicant reviews and agrees to comply with all relevant University policies, including those governing intellectual property and research data.
- k) Will ensure the applicant obtains and maintains approvals for the use of human subjects, animal subjects or biological materials, as applicable.
- l) Will consult with the applicant about current duties and roles and, if necessary, make adjustments that will accommodate effort to conduct the research, public service, or evaluation project in compliance with sponsor regulations.
- m) If the applicant will not have an employment relationship with the department or institute for the life of the project, will create plans to fulfill obligations of any award, including the completion of programmatic and financial reports in the event of the applicant's absence for any period of time or in the event employment is terminated during the life of the project.
- n) If students will participate, will ensure the supervision of students' research with respect to grading and degree requirements in event of PI/PD absence or disengagement.

#### **4. Expedited Procedures for Granting Exceptional PI/PD Status**

With issuance of this policy, the Vice Provost for Research will defer to the responsible Dean or other division head final approval to grant PI/PD status to full-time Professional Research Staff, Honorific Research Faculty, or Continuing Contract Faculty, so long as the Standards and Conditions for fulfilling such obligations are met.

Requests for any departure from these Conditions, or recommendations on behalf of individuals not holding the above titles, should be referred to the Director of the Office of Sponsored Projects (OSP). Such recommendations should include supporting documentation: namely, a CV of the individual for whom approval is being requested, and a response to each of the Standards and Conditions listed above. In all cases, if the circumstances for granting PI/PD status are unclear or in dispute, or there are other intervening issues, prior consultation with the Director of OSP is encouraged.

All recommendations for PI/PD status made by a department chair on behalf of a faculty member or a professional research staff member, should be submitted to the Dean or division head in a timely manner, with a reasonable opportunity to review and approve. Recommendations should be submitted in conjunction with the development and preparation of a proposal and in advance of the deadline for submission of an application for funding.

The Dean's written decision to confer PI/PD status is ordinarily project-limited, and must be renewed upon any subsequent proposal. Any recommended term-limited exceptions (of 1 year, 3 years, 5 years, etc.), should be identified as such to OSP. Recommendations for PI/PD status shall be submitted to the Dean with sufficient time to allow the Dean a reasonable opportunity to make a decision in advance of a sponsor's deadline.

## 5 Other Considerations

New appointees. The above Standards and Conditions for granting PI/PD status, and the processes and procedures they require, should be factored into the timeline for recruiting new appointees to positions covered by this policy, if appointees will be expected to engage in sponsored research or programs.

Lead PIs/PDs. For sponsored programs requiring multiple PIs/PDs, the authority and accountability for leading and directing the scientific or other programmatic aims is equally held among all PIs/PDs listed on the proposal, but the first listed will be considered the Lead PI, responsible for coordinating the proposal development, routing and approvals, and for communication with NYU administration and sponsor program officials on behalf of project leadership.

Approval for co-PIs/co-PDs, co-Investigators and professional staff. Consistent with long term practice, exceptional approval is not required to allow individuals to serve as co-PIs/co-PDs, co-Investigators, or other professional staff in sponsored research or programs directed by a qualified PI/PD, so long as the proposed roles for the co-PIs will not conflict with regular teaching and other duties and so long as the co-PI's/co-PD's understand their responsibilities as Investigators and comply with all research related policies and procedures. Continuing Contract faculty who serve as co-PI's/co-PD's or co-Investigators must also meet all requirements of the policy on [Continuing Contract Faculty as Principal Investigators of Sponsored Projects and Programs](#).

Graduate students and post docs. While a graduate student or postdoc may be named as the PI on a proposal directed to an individual fellowship program that specifically targets that applicant pool, a qualified PI/PD, normally a paid, full-time tenured or tenure track faculty member, must serve as the Faculty Mentor for the fellowship and must function as the NYU Lead PI of record for supervisory and administrative purposes.

Paid Fellows. Individuals who are fully supported by external fellowships and who are Professional Research Personnel at NYU may serve as PI so long as a tenured/tenure-track faculty member who is eligible to serve as PI serves as the Faculty Mentor and is the NYU Lead PI of record.

Administrators and staff. In the case of some University public service projects or other sponsored activities (not research), the role of Project Director (PD) may fall to an officer of administration or other NYU staff member with individual competence in the program area.

Outside entity. For Investigators at outside entities that are collaborating organizations, the individual may serve as PI/PD under a standard subaward agreement issued by NYU.