University Policy Number 1000.02
Principal Investigator (PI) Eligibility and Responsibilities

Responsible Administrator: Associate Vice Provost of Sponsored Programs and Research
Responsible Office: Sponsored Programs and Research Office
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Policy Statement
Claflin University (CU) has a policy of defining the eligibility and responsibilities of Principal Investigators (PIs) who manage and coordinate sponsored projects to ensure adherence to CU and sponsors' regulations.

Statement of Purpose
This policy establishes eligibility criteria and defines the roles, responsibilities, and expectations of a Principal Investigator (PI) at Claflin University. The goal is to ensure that all externally funded research and sponsored programs are managed effectively and in compliance with institutional policies and federal regulations. This policy aligns with:

- OMB Uniform Guidance (2 Code of Federal Regulations Part 200)
- National Science Foundation (NSF) Grant Policy Manual
- National Institutes of Health (NIH) Grants Policy Statement
- Federal Acquisition Regulations (FAR) for contracts

Applicability
This Principal Investigator (PI) Eligibility and Responsibilities Policy applies to all Claflin University faculty, staff, researchers, and administrators who engage in externally funded sponsored projects. It governs individuals who:

- Submit proposals for external funding (federal, state, private, or corporate grants and contracts).
- Receive and manage sponsored research funding through Claflin University.
- Oversee or participate in research projects funded by external agencies.
- Supervise students or staff on grant-funded activities.
- Engage in compliance-related activities, including research integrity, effort reporting, and financial oversight.

Definitions
A Principal Investigator (PI) is the lead researcher and administrative authority responsible for directing a sponsored project. The PI ensures that the project follows the

funding agency's terms, institutional policies, and federal regulations. The PI is accountable for the award's technical, programmatic, financial, and compliance aspects throughout its lifecycle.

PI Eligibility Criteria
To serve as a PI at Claflin University, an individual must:

Hold an Eligible Appointment:
- Tenured or tenure-track faculty (Assistant Professor, Associate Professor, Professor)
- Research faculty or staff with a full-time appointment
- Clinical faculty with research responsibilities
- Senior administrators with research oversight roles (if applicable)

Exceptions for Non-Faculty Members:
- Adjunct faculty, visiting scholars, postdoctoral researchers, and research staff may serve as PIs only with:
  - A full-time appointment at Claflin University during the grant period.
  - Written approval from their supervisor and Associate Vice Provost of Sponsored Programs and Research.
  - A designated faculty mentor or Co-PI (if required by the university).

Student Eligibility:
- Graduate students and undergraduate students **cannot** serve as PIs.
- Students may submit proposals as the lead researcher under the sponsorship of an eligible faculty member (PI or Co-PI).

Multiple PI (MPI) Proposals:
- Some funding agencies (e.g., NIH, NSF) allow Multiple PI (MPI) leadership structures.
- The lead PI at Claflin University must be eligible under this policy and take primary responsibility for institutional compliance.

PI Responsibilities

Proposal Development

- Writing the technical narrative and research plan.
- Preparing the budget and justifications in compliance with sponsor and institutional guidelines.
- Ensuring the proposal meets federal, sponsor, and institutional policies.

Internal Approvals:

- PIs must route all proposals through Claflin University's Sponsored Programs and Research Office (SPAR) for internal approval before submission.
- PIs must secure approval from:
    - Department Chair, Dean, or Supervisory.
    - SPAR and Finance Office (for budget review and compliance).

Conflict of Interest Disclosure:
- PIs must disclose any financial conflicts of interest (FCOI) per 42 CFR 50 Subpart F (PHS) and NSF policies.
- FCOI training and management plans must be completed before submission.

Post-Award Responsibilities

Project Execution & Research Integrity:
- Ensuring the research follows the approved scope of work.
- Adhering to research ethics, Responsible Conduct of Research (RCR), and Institutional Review Board (IRB) requirements.
- Reporting any research misconduct (fabrication, falsification, plagiarism) per 42 CFR Part 93.

Financial Management & Compliance:
- Ensuring all expenses are allowable, allocable, and reasonable per 2 CFR 200.403.
- Monitoring subawards and consultant agreements to comply with 2 CFR 200.332 (Subrecipient Monitoring).
- Reviewing and approving expenditures in accordance with the project budget.

Effort Reporting:
- Certifying time and effort semi-annually per Claflin University's Time and Effort Policy.
- Ensuring personnel paid from the grant commit the appropriate effort level.

Progress and Financial Reporting:
- Submitting technical progress reports as required by the funding agency.
- Coordinating with Fiscal Affairs to ensure timely financial reporting and invoicing.
- Ensuring all cost-share commitments are documented and met.

Research Compliance Responsibilities

Human & Animal Subjects Protection:
- Ensure all research involving human subjects is approved by the Institutional Review Board (IRB) per 45 CFR 46.

Export Control and Data Security:
- Adhere to export control laws (EAR, ITAR, OFAC) and Controlled Unclassified Information (CUI) regulations.
- Ensure data security and privacy compliance (e.g., NIST 800-171 for federally funded cybersecurity projects).

Intellectual Property (IP) and Technology Transfer:
- Follow institutional policies for intellectual property (IP) ownership and commercialization.

Project Closeout Responsibilities

Final Reports:
- Submit final technical reports, financial reports, and invention disclosures by the sponsor's deadline.

Record Retention:
- Retain grant records for at least three (3) years after project closeout per 2 CFR 200.334.

Final Compliance Review:
- Work with SPRO and the Finance Office to ensure all grant funds are reconciled and properly accounted for.

Consequences of Non-Compliance
Failure to fulfill PI responsibilities may result in:

- Loss of PI privileges on future proposals
- Suspension or termination of the grant award
- Personal liability for unallowable costs
- Institutional sanctions or disciplinary action

PIs are expected to attend annual training sessions on sponsored project administration.

Policy Review and Updates
This policy will be reviewed annually by the Sponsored Programs and Research Office (SPAE) ensure compliance with federal, state, and institutional regulations.