

To: Legislative History

From: Brent Brown, Executive Director for Office of Sponsored Projects (OSP); Caren Frost, Associate Vice President for Research Integrity & Compliance (AVPRIC); Sarah Projansky, Vice Provost for Faculty & AA

Policy Owner(s): AVPRIC and OSP Director

Date: 3/3/2025

Re:

- Proposed **new** rule R7-200B: PI Eligibility and Responsibilities in Sponsored Projects
 - Proposed **revision** to guideline G5-112C: Additional Benefits for Emeritus Retirees
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Introduction and Background

Rule R7-200B: Principal Investigator Eligibility and Responsibilities in Sponsored Projects incorporates into University regulation several existing standards and requirements currently described in the OSP [Research Handbook](#) regarding Principal Investigator (PI) eligibility and responsibilities.

R7-200B supports the oversight, management, and success of sponsored projects by ensuring (1) compliance with funder regulations and policies, (2) fulfillment of University obligations with award terms and conditions, and (3) continuity in University research projects and programs.

Guideline G5-112C: Additional Benefits for Emeritus Retirees is being updated to match the new rule regarding Emeriti faculty PI service.

Please note that this rule is governed by University [Policy 7-200: Research Administration Policy](#), which “supports academic freedom and the right to be free and unfettered in pursuing intellectual directions.”

Proposed Changes

As indicated above, Rule R7-200B features standards and requirements for PI eligibility and responsibilities that are already defined within the OSP Research Handbook.

- With respect to PI eligibility, the Research Handbook specifies that “A person holding appointment as either a regular or career line faculty member may be designated as a principal investigator (PI).”¹ The Research Handbook further identifies “full-time”

¹ <https://osp.utah.edu/grant-life-cycle/develop-proposal/understand-pi-eligibility.php>

appointment as the first “qualification for PI status.” The Research Handbook does not, however, apply these standards to various circumstances for faculty and non-faculty PI service, which has resulted in some confusion. Therefore, R7-200B helps to resolve uncertainty by describing different PI and Co-PI configurations, consistent with the intent of the OSP Handbook, designs of the Vice President of Research and Vice Provost for Faculty, and needs of the University. An exception process for less common situations is provided.

- G5-112C, Subitem III.A.2.k. is being updated to reflect that Emeriti faculty may serve as a Co-PI on a sponsored award, and a PI on an intramural award, consistent with all University regulations, limitations, and approvals.
- G5-112C, Subitem III.A.2.c. and f. have been minimally updated by the HR Director of Benefits to clarify benefits and provide a relevant hyperlink.

Rationale

The administration of sponsored projects is a joint effort between the PI and the University. PI ingenuity and expertise, in combination with University resources and Institutional assurances, are essential to obtaining sponsored projects. The University, as the awardee of sponsor funding, is held responsible and accountable to the sponsor for the performance of the funded activity and the proper use of funds. However, without the full cooperation and oversight of the PI, the University would not be able to fulfill its obligations as the awardee. Consequently, the University has established various eligibility criteria and responsibilities for PIs conducting sponsored research at the Institution. The University’s interest in PI eligibility standards and responsibilities is limited to ensuring that the Institution has the necessary resources and oversight to fulfill its commitments and obligations.

As previously indicated, the PI eligibility standards and responsibilities for sponsored projects have historically been documented in the OSP Research Handbook. Formalizing these terms within a University regulation presents several advantages and benefits, including:

1. Establishes the administration of sponsored research as an essential Institutional priority.
2. Clearly identifies the minimum requirements for PI eligibility and their basic responsibilities in sponsored research.
3. Provides colleges and departments with explicit parameters and guidance for overseeing PIs conducting sponsored research.
4. Engenders greater credibility and authority to promote greater compliance with federal regulations and University policies.
5. Promotes the continuity of research project and programs from one generation of researchers to the next.

The introduction of explicit PI eligibility parameters reduces uncertainty, promotes PI engagement and responsiveness, improves administrative oversight, and helps to ensure the fulfillment of University commitments and obligations.

Regulation Development Process

Rule R7-200B was developed at the instruction of the Vice President of Research, who “is responsible for Institutional oversight of sponsored projects including, without limitation, the authority to: Determine the eligibility criteria for faculty to act as a Principal Investigator(s) or Investigator(s) on a sponsored project.”²

The proposed rule is the collaborative product of the AVPRIC (Dr. Caren Frost), Director of OSP (Brent Brown), and Vice Provost for Faculty & Academic Affairs (Dr. Sarah Projansky).

Zach Mitchell, Research Integrity Officer in the Office of the AVPRIC and Laurel Duncan, Associate Director in OSP, contributed to the drafting and revision of the proposed draft.

The Director of University Regulations and Policy Officer (Allyson Hicks), Office of General Counsel (Michele Ballantyne and Jason Seifert), Assistant VP for Faculty (Kristen Keefe), Director of the Faculty and Academic Affairs (Trina Rich), and HR Director of Benefits (Wendy Poppleton) have all contributed to, reviewed, and approved the policy prior to submission.

Dr. Projansky consulted with the Emeritus Club before initiating the formal review of the proposed rule.

History of Formal Institutional Review

The proposed rule was presented to the Institutional Policy Committee (IPC) on 6/14/2024. The IPC suggested revisions, and the edited rule was re-presented to the IPC on 9/13/2024, and subsequently approved.

The proposed rule was presented to the College of Academic Deans (CAD) on November 20, 2024, and was approved without correction or expression of concern.

The proposed rule was presented to the Harriet Hopf, President of the Academic Senate, on 1/13/2025. Revisions to Subsections III.A.1 and III.A.2 were made during the meeting, resulting in a version that Dr. Hopf supported moving to the Senate Advisory Committee on Academic Policy (SACAP).

The proposed rule was presented to the SACAP on 1/16/2025. A question was raised during the presentation about what is done at other institutions with respect to emeritus faculty as PIs on sponsored projects. A summary of the top 21 [Higher Education Research and Development \(HERD\)](#) institutions is provided below (with raw findings and links provided in an accompanying Excel file):

- 3 (14.3%) institutions automatically allow emeritus faculty to serve as the PI on sponsored projects, without restriction.
- 5 (23.8%) institutions prohibit emeritus faculty from PI service on sponsored projects, without exception.
- 8 (38.1%) institutions prohibit emeritus faculty from PI service on sponsored projects but have a formal process for requesting an exception.

² <https://osp.utah.edu/policies/handbook/roles-responsibilities/>

- 3 (14.3%) institutions require emeritus PIs to gain additional approval prior to serving as PI on a sponsored project (usually individual unit only).
- 2 (9.5%) institutions varied by unit across the institution.