



HMS Primary Responsible Office: Office of Research Administration (ORA)

Approval Body: Research Coordination Committee

Version Number: 1.1

Version Approval Date: March 1, 2019

Original Approval Date: July 1, 2013

Effective Date: July 1, 2013

Revision Date: March 1, 2019

Applicable To: All PIs submitting sponsored proposals through HMS

Subject Area: Sponsored Programs/Research Administration

Key Contact: Director of Pre-Award Services, Office of Research Administration

Security Permissions: HMS

PI Eligibility on Sponsored Programs

Policy Rationale

To establish the criteria that allow individuals to serve as a Principal Investigator (PI) on sponsored programs submitted through Harvard Medical School (HMS).

Policy Statement

A principal investigator (PI) or co-principal investigator is an individual designated by HMS and approved by the sponsor to direct a project funded by an external sponsor. S/he is responsible and accountable for the proper programmatic, scientific or technical conduct of the project and its financial and regulatory management. A current signed Participation Agreement must be on file for each PI.

PI-Eligible Appointments

- Academic rank of professor, associate professor, or assistant professor
- Academic Rank of instructor, lecturer, or research associate, with approval from Department Chair or equivalent
- Faculty in transition:
 - Individuals who are moving to HMS may submit proposals as the PI with documentation from the department that a faculty appointment is pending.
 - HMS faculty members who are on a leave of absence may retain PI status on grants remaining at HMS for up to 3 months with Departmental approval. For periods longer than 3 months, additional approval from the Department and sponsoring agency is required.
 - HMS faculty members who are transitioning to a new institution may retain PI status on grants remaining at HMS for up to 3 months with Departmental approval. For periods longer than 3 months, additional approval from the sponsoring agency and the institutional official of the new institution of the faculty member is also required.
- Students and Post-Docs:
 - Individuals who are trainees may serve as PI on fellowships and career development awards for which holding PI status is a requirement with approval from their faculty mentor and Department Chair or designee.

Additional Considerations

- Faculty at affiliated hospitals are expected to submit proposals through the hospitals unless the proposed work will be done in HMS space.
- Faculty with joint appointments with the VA Boston Healthcare System upon submission of a fully executed Memorandum of Understanding (MOU).

Business Process for Requesting Exceptions

Individuals not meeting the above criteria, including emeritus faculty, may, by demonstrating sufficient cause, petition the Office of Research Administration for approval to submit an application to an external sponsor. Such requests may also require the approval of the Chief Research Administration Officer. Approval is granted for the specific project only, and does not apply to future sponsored projects.

Requests for exceptions should be sent to the Director of Pre-Award Services, Office of Research Administration and must include the proposed PI's CV, a copy of the proposal, and justification for the request and evidence of approval by the Department Chair.

Related Resources/ Referral Links

- Harvard's IP policy and link to sign the Participation Agreement are available on the Harvard Office for the Vice Provost of Research (OVPR) website (<https://vpr.harvard.edu/harvard-university-participation-agreement>).

Revision History

Date of changes: March 1, 2019

- Exceptions section revised to update titles and add note that approvals for exceptions apply for the proposal in question only.
 - Reformatted using new HMS policy template.
-