



## Principal Investigator (PI) Eligibility

### I. CSU Personnel PI Eligibility

Eligibility to act as a principal investigator (PI) or co-principal investigator (Co-PI) on a sponsored project is limited to CSU employees with the necessary skills and knowledge to comply with all award regulations and requirements and who have an appointment type that permits serving as a PI or Co-PI. This limitation is in place because sponsored awards are made to CSU, and CSU is accountable for meeting all sponsored project activity requirements. Additionally, PIs are responsible for determining the intellectual direction of the research and scholarship and often for the training of graduate students and postdoctoral appointees.

Graduate research assistants, postdoctoral fellows, and adjunct faculty are considered temporary appointments and therefore are generally not eligible to serve as PI or Co-PI. Additional restrictions on PI eligibility may apply, therefore it is important to consult with and receive approval to serve as PI or co-PI from the cognizant department chair or unit head prior to preparing a proposal for external funding.

### II. Exceptions

At times it may be beneficial to grant exceptions to students; postdoctoral fellows; research associates; faculty affiliates; adjunct, visiting, or contract faculty; emeritus faculty; temporary employees; non-salaried employees; retired employees; or non-CSU employees to serve as a PI or Co-PI. **All exceptions must be approved in writing by the cognizant department chair or unit head and college dean or equivalent.**

#### New Hires

New hires who have signed offer letters may submit proposals through CSU provided the project period start date is not prior to the appointment start date. In addition, an award cannot be accepted until the member's appointment has begun. *Note: Another eligible PI may need to be named as the PI of record within CSU until the new hire appears in the CSU HR system.*

New hires who have signed offer letters and are currently a PI on an award they are transferring to CSU must meet the PI eligibility criteria or be approved through the exception process. Additionally, these individuals should follow the incoming PI transfer procedures as outlined in the [PI Transfer Guidance](#) document found on the OSP website.

#### Sponsor/Program Requirements

Certain project types, such as fellowships and career development awards, may require that a student, postdoctoral candidate, or non-CSU employee serve as PI. The purpose of these programs is to advance the individual's scientific development under the mentorship of an established investigator named in the proposal. For these programs, consult the cognizant department chair or unit head on PI eligibility. *Note: If appropriate, a letter from a CSU established investigator acknowledging their role and responsibilities for programmatic and fiscal management of the sponsored project should be included in the proposal submission document.*

Additional restrictions on PI eligibility may apply for projects involving controlled unclassified information. In such cases, only persons with appropriate credentials may serve as PI, despite meeting other eligibility criteria. Consult with Secure and Global Research for projects involving controlled unclassified information.

#### Additional Exceptions

There may be times when clinical staff, staff scientists, or individuals with appointment types that fall outside eligibility guidelines need to serve as PI or Co-PI due to programmatic needs. Such requests are subject to the written approval of the cognizant department chair or unit head and college dean or equivalent.

### III. PI Responsibilities

PIs and Co-PIs of a sponsored project agree to accept responsibility for the scientific and fiscal conduct of the project and to provide all required award deliverables. Therefore, units are responsible for making certain that

anyone they allow to be a PI or Co-PI is knowledgeable in the responsibilities of that position since any mismanagement, financial or technical, will fall to the unit to cover.

PIs ultimately assume responsibility for all aspects of their sponsored projects, including human resources issues; regulatory compliance issues, including compliance with \*conflict of commitment/conflict of interest reporting; federal regulations in purchasing, assuring that spending is allowable, allocable, and reasonable and within the project scope, period, and budget; effort certification requirements for project personnel; subrecipient monitoring and review and approval of subrecipient work and payments; and ensuring that technical reports are submitted on time and in the proper format.

\*PIs applying for PHS-funding must confirm the disclosure of all Significant Financial Interests at the time of application for PHS funding. This rule also applies to agencies that follow PHS-regulation. Individuals seeking PI status who are not in the CSU-system for making COI disclosures (e.g., students, non-CSU personnel) must contact the [Office of Sponsored Programs](#). The department/unit where the proposal is originating must assure proper disclosure and management of conflicts for such individuals.