Co-PI or Multi Principal Investigators (MPI) on Sponsored Projects

Background and Purpose:

It is understood the co-PI and multiple PD/PI project option offers important opportunities for investigators seeking support for projects or activities that require a "team science" approach and which do not fit the single-PD/PI model.

The purpose of this guidance is to ensure that the research project is well-managed, and that the PIs work together in a productive and cohesive manner. All communications with the sponsor, report preparations, and budget monitoring on sponsored projects (53s) should include all co-principal investigators (co-PIs) to ensure accuracy, transparency, and assist in monitoring compliance with sponsor requirements.

Definitions:

PD/PI: When an individual has full responsibility & authority for the project.

Multiple PI and Co-PI: Some sponsors use the term Co-PI or Multiple PI to indicate the role has equal responsibility and authority as the lead PI (NIH uses the term Multiple PI, and NSF uses the term Co-PI). While other sponsors use the term to represent that the individual has more authority than a co-investigator but not equal authority as the PI/PD (USDA). Some sponsors use the term to represent an alternative title for a non-lead PI on a multi-PI project. Not all sponsors use this role.

Co-investigators or Co-I: This title is used to indicate the individual makes significant contributions but does not have overall responsibility and authority for the project. They are NOT considered PD/PIs.

Responsibilities & Procedures:

A comprehensive list of CSU's Sponsored Programs Roles and Responsibilities may be viewed at: https://www.research.colostate.edu/osp/wp-content/uploads/sites/21/2023/06/Roles-and-Responsibilities-Matrix-Master-6 15 2023-v2.pdf.

All PD/PIs will share equally in responsibility for two distinct functions: (i) an academic function of assuming the responsibility for the intellectual content of a sponsored project, and the ability to oversee the design, development and implementation of the project; (ii) a regulatory function of assuming responsibility for financial and non-financial compliance with the regulatory requirements of both the sponsor and the institution in the course of performing activities connected with the project.

Additional important considerations for designation of multiple PD/PIs:

- All PD/PIs share the responsibility and authority for leading and directing the project
- All PD/PIs must meet CSU's PI Eligibility requirements (PI Eligibility)
- All PD/PIs must be current with submission of their annual research conflict of interest disclosure forms

- All PD/PIs must be registered in a sponsor's electronic research administration system (such as eRA Commons or Fastlane) with a PD/PI role
- The first PD/PI listed in the sponsor application and designated the Lead Principal Investigator role in Kuali Research Proposal Development (KRPD) will serve as the Contact PD/PI
- As required by the specific sponsoring agency, the Contact PD/PI may be responsible for communication between the sponsor and the rest of the leadership team
- Being named contact PD/PI does not imply any particular role within the leadership team or confer any difference in scientific stature to that person Unless limited by a specific term of award, the acknowledgment of the requested budget allocation will not limit institutional authority to manage or rebudget funds between PI/PDs when deemed appropriate by the leadership team

Budget Monitoring:

Overview:

Common to the regulations of all sponsors is the fundamental requirement that a particular grant or contract may be charged only for costs related to that project and that those costs must meet the standards of allowability and allocability. Fund availability, grant expiration or any other terms of convenience may not govern how, when or which sponsored agreement is charged. It is ultimately the responsibility of the PI to ensure that expenditures, whether they are related to personnel, equipment, supplies or other categories, are charged to their individual sponsored agreements in an appropriate and timely manner.

The Office of Sponsored Programs (OSP) at CSU is specifically tasked to provide the highest level of technical support to PIs and their staff to ensure successful compliance with the financial and administrative requirements of sponsored programs.

Allocation of Funds Among Pls:

- If budget allocation among CSU's PIs is planned, the distribution of resources to specific components of the project or the individual PIs should be delineated in the proposal.
 - If separate budget allocations are desired for each PD/PI, discrete internal budgets for each PD/PI will be required with the application materials. These budgets will not be included in the application sent to NIH, but the amounts should be reflected in separate budgets within the KRPD record.
- For NIH proposals, the allocation must be described in the Leadership Plan. In the event of an award, the requested allocations will be reflected in a footnote on the Notice of Grant Award that indicates the allocations requested. Re-allocation of funds must be via a joint decision of the PIs, and the process for re-allocation should be included as part of the approach described in the Leadership Plan.
- For NIH proposals, if one of the PIs is at another institution, the proposal should include a subcontract proposal for the other institution, and the funding allocation will be administered through a subcontract.
- For NSF proposals, a single proposal may include a subaward for a PI at another institution, or by simultaneous submission of proposals from different organizations, with each organization requesting a separate award.

Kick Off Meeting

Review Leadership Plan:

- a. **Roles and Responsibilities:** Should be clearly defined for each PI, outlining their specific areas of expertise and contribution to the project. This may include aspects such as project management, research design, data collection and analysis, publication and dissemination, and interactions with stakeholders.
- **b. Decision-Making Processes:** Describe how decisions will be made within the project, including the process for resolving conflicts or disagreements among the PIs. This should involve regular meetings, consensus-based decision-making, or delegation of decision-making authority to specific PIs based on their expertise.
- **c. Communication and Collaboration:** Specify how the PIs will communicate and collaborate with each other, as well as the project team and external stakeholders. This should include regular meetings, communication protocols, and/or mechanisms for sharing information and updates.
- **d. Timeline and Milestones:** Establish a timeline with key milestones and deliverables for the project. Clarify how progress will be monitored, how deadlines will be met, and how the PIs will coordinate their efforts to achieve project objectives.
- e. **Budget and Resource Allocation:** Address how the project budget will be managed and how resources will be allocated among the PIs. This could involve assigning specific budgetary responsibilities to each PI and establishing procedures for tracking expenditures and ensuring compliance with funding agency guidelines.
 - i. Establish a regular communication schedule among the PIs and FOs to discuss budget updates, expenditures, and any financial issues or concerns. This can be done through meetings, email exchanges, or virtual platforms, depending on the preferences and availability of the PIs and FOs.
 - ii. Utilize budget tracking tools that can be used amongst both PIs.
 - iii. Defining predefined spending thresholds, if applicable, to ensure transparency and accountability.
 - iv. FO should prepare and distribute regular budget reports to all PIs, summarizing the current budget status, actual expenditures, remaining funds, and any significant deviations from the approved budget. PIs should assess the project's financial performance and identify any areas where adjustments may be needed, such as reallocating funds between budget categories or revising spending plans.

By implementing these strategies, the PIs can work together effectively to monitor the project budget, maintain financial transparency, and make informed decisions to ensure the project's financial success.

Forms & Resources

https://grants.nih.gov/grants/multi_pi/

https://grants.nih.gov/grants/multi pi/sample leadership plans.pdf

Multi-PI Plan Examples