



PI Eligibility Policy

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Background

Because of the extent of our collaborations across Harvard and affiliated institutions, the Harvard T.H. Chan School of Public Health faculty have a range of appointment and employment arrangements. These circumstances add complexity to decisions about PI status on grant submissions. The purpose of this document is to articulate the Harvard Chan School's policy on appointees' eligibility to serve as PI on grants submitted through the Harvard Chan School.

PI Eligibility

- 1. Eligible Appointments.** PIs on research grants must have a faculty appointment or other eligible academic or research appointment at the Harvard Chan School (e.g. research scientist, instructor.)

Eligibility requirements for Research Awards: Individuals with a faculty or other academic or research appointment at the Harvard Chan School, who are Harvard Chan School employees or Harvard Chan School appointees employed at the following Harvard-affiliated institutions, are eligible to serve as PI on research grants at the Harvard Chan School. However, we expect that the majority of work primed through the Harvard Chan School will be conducted at the Harvard Chan School and not constitute a pass-through to affiliated institutions.

- Harvard Medical School, Brigham and Women's Hospital, BI-Deaconess Hospital, Children's Hospital, Dana-Farber Cancer Institute, Mass. General Hospital, and the Botswana-Harvard Partnership.

Eligibility requirement for Training Grants: Individuals with any Harvard Chan School faculty or other academic or research appointment can serve as the PI on Harvard Chan School training grants that benefit Harvard Chan School students, irrespective of employment status.

- 2. Adjunct Faculty in Transition:** Harvard Chan School faculty who have been given adjunct appointments as part of their transition to a new institution can retain PI status on grants remaining at the Harvard Chan School.
- 3. Other Adjunct Faculty:** Harvard Chan School faculty with Adjunct appointments may serve as PI if they are employed at the Harvard Chan School for at least 25% FTE.
- 4. Non-Employee Appointees:** Individuals with an eligible faculty or other academic or research appointment at the Harvard Chan School, but who are not Harvard Chan School employees and/or who are not employees at the approved Harvard-affiliated institutions noted above, require approval before they are able to serve as PI on research grants. The approval process is outlined in the next section, below.

- Requests for granting PI status to investigators from institutions other than the Harvard-affiliates listed above will be carefully scrutinized, and will be uncommon.
- It is anticipated that non-employees with an Harvard Chan School faculty or other academic appointment will serve as PIs on grants primed through the Harvard Chan School only in circumstances in which the proposed work is mission critical, and in which the school's participation is clear and compelling.
- Having an MOU with the Harvard Chan School does not provide PI status for investigators from another institution, and MOUs will not provide PI status for non-employees.

5. Students and Post-Docs: Students are not allowed to serve as PI on research grants, but can serve as PI on individual fellowships and career development grants for which holding PI status is a requirement (e.g. NIH F or K awards). This includes awards that are designed to support their academic experience, and may include small travel awards to conferences or dissertation awards.

Post-doctoral fellows can serve as PI on individual fellowships and career development grants. Awards that support the transition to independent investigator, such as the NIH K99/R00, are encouraged. Post-doctoral fellows do not typically apply as PI for research awards targeted to established investigators – such as the NIH R series. In the unlikely event that a post-doctoral fellow intends to PI a research grant at the Harvard Chan School, the decision to support a post-doc in submitting a research grant application will be made by the Department Chair and must be determined on a proposal by proposal basis. Chair approval will be indicated by Chair's signature on proposals submitted to the Harvard Chan School's Sponsored Programs Administration Office. Support for reappointment and any associated salary support will be the responsibility of the Department.

- Some career development grants require the PI to hold a faculty appointment by a specific point in time (e.g., NIH R00). Authority and responsibility for signoff on these proposals shall continue to reside with Department Chairs. Department Chairs cannot guarantee a faculty appointment, and if the applicant does not hold the required appointment when the award is made, the Harvard Chan School will not accept the award. The Harvard Chan School's Sponsored Programs Administration (SPA) has authority to accept awards on behalf of the School, and will ensure that eligibility criteria are met before accepting awards.

6. PI Role: The PI Eligibility Policy applies to proposals to serve as Prime PI or Subcontract PI at the Harvard Chan School. PI eligibility review is not required for appointees to serve as a Co-Investigator, or subproject PI (e.g. on an NIH P or U grant). Please note, however, that if an ineligible Harvard Chan School appointee serves as Co-Investigator on an Harvard Chan School research proposal, the approved PI must serve an active role in conducting the research and maintain primary responsibility for overseeing the grant.

7. Research Programs Operating Outside of the Harvard Chan School: It is expected that, for research proposals submitted through the Harvard Chan School, a significant proportion (50% or more) of the work will be conducted at the Harvard Chan School. In instances where over 50% of work will be conducted outside of the Harvard Chan School, Chairs may be asked to provide a detailed rationale for

why the PI must channel the proposal through the Harvard Chan School rather than an outside institution.

Process for Approval of Eligibility as PI

❖ Timeline and Process

- Annually in February: Each year at the beginning of the calendar year, Department Chairs and Directors of the four Centers¹ based at the Harvard Chan School will be sent a list of non-employee faculty and other eligible appointees who require waiver approval in order to serve as PI on Harvard Chan School prime grants.
- Annually in March: Within a month, the Chair /Center Director will confirm the accuracy of their Department/Center list.
- Individuals with a faculty or other eligible academic appointment at the Harvard Chan School and who are not Harvard Chan School employees or employees of affiliates require approval before they are able to serve as PI on research grants. Thus, for anyone on a Department's list who is not a Harvard Chan School or affiliate employee, but whom the Chair/Center Director determines should have PI status, the following steps must be completed:
 - Chairs/Center Directors will carefully consider the PI's portfolio and research activities at the Harvard Chan School to determine:
 1. If their work is critical and central to the Harvard Chan School's mission and the Department/Center's research agenda;
 2. The extent to which their work and scientific leadership occurs at the Harvard Chan School, including the PI's percent effort at the Harvard Chan School;
 3. The material consequences to the Harvard Chan School related to the individual's PI status, including a justification of why the individual's work with the Harvard Chan School could not generally be conducted under a subcontract to the Harvard Chan School from the individual's home institution;
 4. The approval of the institution at which the individual has their primary appointment, stating that the individual may serve as PI on Harvard Chan School grants.
 - In the first year of implementation, the Chairs/Center Directors will be asked to complete a PI Eligibility Waiver request form certifying that the individual meets these criteria, including written approval from the individual's primary institution. In subsequent years, the Chair/Center Director will be asked to confirm whether there have been any changes in the PI's portfolio related to these criteria.
 - If there are additional individuals that the Chair/Center Director wishes to have added to the PI eligibility list, they will be asked to submit a PI Eligibility Waiver request form, detailing their rationale for providing PI status to the individual, as part of the annual approval process.

¹ HSPH Centers include the Harvard Center for Population and Development Studies, François-Xavier Bagnoud Center for Health and Human Rights, the Harvard Humanitarian Initiative, and the Harvard Global Health Institute.

- Please note that this process is in place to determine who is eligible to be a Harvard Chan School PI. All grant submissions are still required to go through our routine research administration procedures, and to comply with all other School and University policies.
 - Annually, by April 1: Each Department's/Center's list will be reviewed by the Office of Research Strategy and Development (ORSD) and approved by the Dean for Academic Affairs.
 - A list of eligible PIs will be maintained by the Harvard Chan School's Sponsored Program Administration (SPA).
- ❖ **Ad-hoc eligibility review:** Non-employee faculty/academic appointees will be allowed to submit grants as PI only if they are on the approved list of eligible PIs. If evaluation of eligibility is needed outside of the annual process, a waiver request form should be submitted to ORSD sixty calendar days in advance of any Harvard Chan School internal grant deadlines. This will ensure that an individual does not do significant work to develop a grant, only to find out that they cannot submit it through the Harvard Chan School.
 - ❖ **Policy communication:** Chairs/Center Directors and their administrators are responsible for communicating this policy to those holding faculty and other academic appointments in their Department/Center, and need to ensure that non-approved PIs do not begin work on grant applications until their status has been evaluated. Simply having written a grant will not ensure PI eligibility.
 - ❖ **HSPH involvement and compliance:** Departments/Centers are responsible for working with the PI to determine that the work is integrated within the Harvard Chan School, the budget reflects the Harvard Chan School's involvement, the grant does not reflect a pass-through to another institution, and proper mechanisms are in place to ensure compliance with the Harvard Chan School and regulatory research requirements. All Harvard Chan School policies regarding research administration apply to employee and non-employee PIs alike.
 - ❖ **Continued SPA review of individual submissions:** Sponsored Programs Administration will continue to review individual proposals for consistency with Harvard Chan School policy and Harvard University Provost's Criteria (see: <http://osp.fad.harvard.edu/content/provost-criteria>). This includes review for potential risk to the School or University, including Provostial review criteria (including any proposal where greater than 50% of the project budget will be subcontracted outside of Harvard). SPA will continue to work with PIs and Departments in order to mitigate risk on research projects.
 - ❖ **New appointees:** When new Harvard Chan School appointments are given to faculty or others who are non-employees, Chairs should provide them with a written statement indicating that there are limited conditions under which a non-employee faculty member or academic appointee can serve as PI, and that in most cases non-employees will not serve as PI.
 - ❖ **Student and post-doctoral proposals.** When students or post-doctoral fellows apply for funding opportunities that require them to hold a faculty appointment by a specific point in time, Chairs retain authority to sign off on such proposals on behalf of the department. Chairs should clarify award terms

and expectations with the applicant. Chairs cannot guarantee a faculty appointment and, if the agency makes an award but the student does not yet hold the required faculty appointment, the Harvard Chan School will not accept the award.