George Mason University Procedure for Principal Investigator (PI) Eligibility Exception Requests

General Description:

Individuals who wish to submit proposals for externally funded research and who are not eligible by appointment to serve as a PI, must request a PI eligibility exception.

Approving an exception allows an individual who is not eligible to serve as PI to submit proposals and lead awarded projects, and entrusts that individual with all of the responsibilities and obligations incumbent upon PIs.

Definitions:

Principal Investigator: the individual responsible for the scientific, technical, or programmatic aspects of the grant, as well as resource allocation, fiscal stewardship, and overall administrative conduct of a sponsored project within the terms and conditions of the award and in accordance with University rules and regulations. Where there are other PIs on the award, designated by Mason and the sponsor, they are referred to as Co-PIs. In these cases, the PI assumes the role of project leader or lead PI and is listed first on the proposal. A lead PI must hold an eligible appointment (section II.A.1 of this policy). The PI and any identified Co-PIs, however, will be jointly responsible for the proper conduct of the project, including submission of the requisite project reports.

Requesting Individual: the individual seeking an eligibility exception under Policy 4012: Principal Investigators in order to serve as Principal Investigator on a sponsored project.

Administering Unit: the unit that will administer the sponsored project for which the Requesting Individual is requesting the PI eligibility exception.

Procedures:

1. Requests for a PI Eligibility Exception: The Requesting Individual submits a Principal Investigator (PI) Eligibility Exception Form to the head of the Administering Unit. Exception requests must include, at minimum:
   a. The proposed individual’s relationship to the unit that will administer the project;
   b. A compelling reason for the request;
   c. A description of the proposed activities and their merit;
   d. A discussion of the individual’s ability to fulfill the responsibilities of a PI, including confirmation that the individual satisfies the PI eligibility and regulatory requirements of the proposed sponsor.
   e. Confirmation that space and facilities are available for the individual’s use without detriment to the regular instructional and research responsibilities of the unit.

2. Review and Approval of Requests:
   a. The head of the Administering Unit is responsible for ensuring that the PI Eligibility Exception Form is complete and accurate. After reviewing the form for completeness
and accuracy, the Administering Unit head will sign the request and forward it to their collegiate Dean.
b. The Dean will review the request to determine if approving the exception is in the best interest of the University. The Dean will approve or not approve the request, and will forward the action to the Vice President for Research, Innovation, and Economic Impact for their information.
c. Should the Vice President for Research, Innovation and Economic Impact have concerns about the Dean’s decision, s/he will consult with the Dean to explain concerns and attempt to reconcile differences. In the event that agreement is not reached about the PI approval or non-approval, the matter will be forwarded to the Provost who will make the final decision about the PI status.

3. **Notices and recordkeeping:** Approved exceptions will be provided to OSP for retention and reporting. OSP will provide a copy of the exception to the Requesting Individual and to the Dean or Director.

**Related Forms, Guidance, and SOPs:**
Principal Investigator (PI) Eligibility Exception Form

**Responsibility:**
- Chairs
- Deans
- Vice President for Research Innovation and Economic Impact
- Office of Sponsored Programs

**Approval and Version History:**
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