

 <p><b>Category:</b> Administration</p> <p><b>Policy applicable for:</b> Faculty/Staff</p>	<p><i>Policy Title:</i></p> <p><b>Affiliated Faculty acting as Principal Investigators on Sponsored Awards</b></p> <p><b>Effective Date:</b> 09/10/2018</p> <p><b>Prior Effective Date:</b> N/A</p> <p><b>Enabling Acts:</b> Code of Federal Regulations Title 2, part 200 NIH Grants Policy Statement</p>	<p><i>Policy Number:</i></p> <p><b>1.9.3</b></p> <p><b>Policy Owner:</b> VP for Research</p> <p><b>Responsible Office(s):</b> Sponsored Research Services</p>
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## Background

Within the university, there are Affiliated Faculty who are employees of another organization but have duties and privileges within the university (e.g., College of Medicine) and at times perform work on sponsored awards under the purview of the university. Affiliated Faculty are not employees of the university.

Most external sponsor regulations do not prohibit non-employees from acting as Principal Investigator on an award; however, there are restrictions to such arrangements. The following policy helps ensure that the university is compliant with all relevant policies and regulations regarding such relationships. This policy will apply to all sponsored program submissions issued on or following the effective date of the policy.

## Policy

All sponsored award applications submitted by the University of Cincinnati must either have a UC employee as Principal Investigator / Co-Principal Investigator, or an Affiliated Faculty member if the following requirements have been met:

1. The Affiliated Faculty has read, agreed to, and signed the “Affiliated PI Relationship Agreement” as issued by the university.
2. The Affiliated Faculty has been approved, in writing, to act as PI on this project by the Dean (or their designee) of the college originating the grant.
3. The Affiliated Faculty has been approved, in writing, to act as PI on this project by the Vice President for Research (or their designee).
4. A university liaison has been named who would, in consultation with the PI, conduct certain internal business transactions that the Affiliated Faculty, due to their lack of employment status, may be unable to complete on their own. This liaison would be chosen by the college and will inform the PI of any transactions initiated.
5. The steps above are completed prior to submission of any new proposal, competitive renewal, or for any situation where a change of PI was requested, and the PI involved was a non-employee.
6. If any legal, regulatory, or compliance matters make the appointment of a non-employee PI untenable, the university may deny the request or, if the request has

already been approved, require a change of PI to a university employee at any time.

### **Roles and Responsibilities**

- The Authorized Official submitting any such sponsored program proposal is responsible for ensuring all proper approvals have been secured prior to proposal submission and the Affiliated PI Relationship Agreement is included as part of the proposal.
- The Affiliated Faculty is responsible for reading and understanding the Affiliated PI Relationship Agreement, and for working with the designated university liaison to ensure all necessary administrative activities are completed.
- The submitting college is responsible for reviewing and approving the proposed relationships on a case-by-case basis, and assigning a liaison to work with the Affiliated Faculty.
- The Office of Research is responsible for ensuring there are no matters, notwithstanding college approval, that would make the appointment unworkable.

### **Related Links:**

[Sponsored Research Services – Research How2](#)  
[NIH Grants Policy Statement](#)  
[Code of Federal Regulations, 2 CFR part 200](#)

### **Phone Contacts:**

Sponsored Research Services                      556-5969