



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). See Table 1 at the end of the document for a list of eligible appointments.

Eligibility requirements for Research Awards: Individuals are eligible to PI grants through the Harvard Chan School if they meet one of two following criteria:

- a. The individual holds a PI eligible Harvard Chan appointment and receives at least 25% employment (25% salary support) through the Chan School; OR
- b. The individual holds a PI eligible Harvard Chan appointment and runs their research operation at the Chan School.

Eligibility requirement for Training Grants that support Harvard Chan Students and Graduate Programs: 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, postdocs, and graduate programs, irrespective of employment status.

2. **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. Ordinarily, no new grant applications will be accepted once a primary faculty member transitions to adjunct status. Upon departure, the PI Eligibility Waiver Review Committee will meet to develop a transition plan.
3. **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 OR do not run their research operation at the Chan School, require approval before they are able to serve as PI on research grants. Individuals who do not meet PI eligibility criteria listed above will need to secure approval for each grant that they are requesting to submit through the Harvard Chan School and

approval will be granted on a case-by-case/proposal-specific basis. The approval process is outlined in the next section, below.

- Requests for granting PI status to investigators from external institutions will be reviewed by a standing PI Eligibility Waiver Review Committee, which meets on the third Thursday of each month. Waivers must be submitted at least two weeks prior to the standing committee meeting in order to be reviewed by the PI Eligibility Waiver Review Committee. Waivers must be submitted online by the Department Administrator with Chair sign-off.
- Waivers will be highly scrutinized and granted only when there is a compelling scientific and financial justification for submitting the application through the Chan School. It is anticipated that PI eligibility waivers will be approved only for grants primed through the Harvard Chan School only in circumstances in which: (a) the proposed work is mission critical; (b) the school's participation is clear and compelling; (c) the majority of the grant budget (50% or more) is used to support Chan School personnel and resources; (d) the grant period aligns with (i.e., does not exceed) the term of the individual's Harvard Chan appointment; (e) the department confirms they have the infrastructure in place to support the award; (f) the sponsor/funder has an established track record with the University and has been fully vetted in terms of compliance.
- 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.

4. Students, Post-Docs, and Research Associates: Students are not allowed to serve as PI on research grants, but can serve as PI on individual fellowships and dissertation grants for which holding PI status is a requirement (e.g. NIH F awards). In these cases, faculty mentors are expected to be actively engaged in mentoring the awardee and overseeing the project. This includes awards that are designed to support students' academic experience, and may include small travel awards to conferences or dissertation awards.

Post-doctoral fellows and Research Associates (RAs) 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 and RAs do not typically apply as PI for independent research awards targeted to established investigators – such as the NIH R series or equivalent non-federal awards where they are expected to conduct independent (non-mentored) work. In the unlikely event that a post-doctoral fellow or RA intends to PI an independent research grant at the Harvard Chan School, the Department Administrator must submit a waiver request with Chair sign-off on behalf of the fellow or RA to be reviewed by the PI Eligibility Waiver Review Committee (as indicated above). In addition to the general review criteria outlined above, the Committee will consider whether proposal submission is likely to be competitive given the postdoc's/RA's career stage and whether grant submission is administratively feasible. 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 current School 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 a Harvard Chan School research proposal, the eligible 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 through 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 PI ineligible 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 who are not Harvard Chan School employees with eligible appointments OR do not run their research operation at the Chan School will require approval before they are able to serve as PI on research grants. Thus, anyone on a Department's list who is not PI eligible, but whom the Chair/Center Director determines should have PI status for a specific research proposal, must go through the PI eligibility review process described in detail below.
 - Please note that this process is in place to determine whether an individual is eligible to PI a research grant proposal through the Harvard Chan School. All grant submissions are still required to go through the School's 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 PI Eligibility Waiver Review Committee 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). Waivers from investigators without PI eligibility status will be reviewed on a case-by-case/proposal-specific basis by the PI Eligibility Waiver Review Committee, which meets monthly. (See below for description of Waiver submission/review 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.

- ❑ **PI eligibility review:** If evaluation of eligibility is needed, a waiver request form should be submitted for review to the PI Eligibility Waiver Review Committee two weeks prior to their standing monthly meeting (which takes place on the third Thursday of each month); waivers should be granted at least two months in advance of the Harvard Chan School internal grant review deadline. 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. The following steps must be completed before a waiver request can be submitted to the PI Eligibility Waiver Review Committee:
 - Chairs/Center Directors will carefully consider the PI's portfolio and research activities at the Harvard Chan School to determine:
 1. If their proposal 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 and contributes to 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 proposed 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 Department Chair or Dean at the institution in which the individual has their primary appointment, stating that the grant may be submitted through the Harvard Chan School with the individual serving as a Chan School PI.
- ❑ Faculty who are transitioning to a new institution do not need to submit a waiver to continue serving as PI on existing awards, but the Waiver Review Committee will meet to discuss their grant portfolio and develop a transition plan and timeline for their active grants.
- ❑ **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/submitted a grant through the Harvard Chan School will not ensure PI eligibility under this amended policy. Furthermore, having been granted a PI eligibility waiver in the past or having an existing grant at the School does not guarantee future PI eligibility status.
- ❑ **HSPH involvement and compliance:** Departments/Centers are responsible for working with PIs 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 serve as 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 compliance 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 copy of this policy or other 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 or postdoctoral fellow does not yet hold the required faculty appointment, the Harvard Chan School will not accept the award.

Table 1. Overview of Eligible Appointments

Eligible Appointments	Ineligible Appointments (Waiver Required)
<p>Faculty and Researchers appointment types employed at the Harvard Chan School with at least 25% FTE:</p> <ul style="list-style-type: none"> • Primary ladder and non-ladder faculty* (all ranks) • Secondary faculty (all ranks) • Research Scientists (all ranks) • Research Associates / Postdocs / Students** 	<p>Faculty and Researchers with the following appointment types and those not employed at the Harvard Chan School:</p> <ul style="list-style-type: none"> • Secondary Faculty with Unpaid Appointments • Adjunct Faculty • Visiting Faculty / Scientists • Instructors • Research Associates / Postdocs submitting independent research awards

*Ladder: Assistant, Associate, Full Professor; Non-ladder: Lecturer, Senior Lecturer, Professor of Practice, Professor in Residence

**Students, Postdoctoral Fellows, and Research Associates are eligible to apply for fellowship, career development, and mentored training grants.