Change in Effort or Status of Principal Investigator or Other Key Personnel

SPA-11-001

About This Policy

Effective Dates:
04-25-2011

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05-03-2017

Responsible University Administrator:
Vice President for Research

Policy Contact:
Steve Martin, Associate Vice President for Research
stemarti@iu.edu

Scope

This policy applies to all Indiana University faculty and staff involved as Principal Investigator or other Key Personnel on sponsored projects.

Policy Statement

It is the policy of Indiana University that any change in status or effort of the Principal Investigator (PI) or other Key Personnel is in compliance with the sponsor’s guidelines and University policy. The PI, further, has the responsibility for initiating notification of any such change and all notifications should be routed to the Office of Research Administration (ORA) for review and transmission to the sponsor. In those cases where the PI, due to the reasons for the change in status or effort, is unable to initiate such notification, the academic unit or responsibility center has the responsibility to notify ORA.

Reason For Policy

To establish guidelines and best practices for the timely notification of the change in effort or status of a Principal Investigator or other Key Personnel on a sponsored program and to permit the University to fulfill its obligations to the sponsor and for the responsible conduct of research.

Procedure

As grant recipient, Indiana University has the responsibility to notify sponsors of significant changes from the proposed PI or key personnel effort devoted to a project. Although the actual requirement may vary depending on the sponsor, normally a change of 25% or more from the committed effort of the PI or other key personnel on the proposal requires notification of the sponsor. The PI has the responsibility for initiating such notification and all notifications should be routed to ORA for review, approval, and transmission to the sponsor.

Sponsor notification and approval is normally required in the following instances:

- **Changes in Committed Effort for the PI or Key Personnel:**
  - Significant change in the level of effort of the PI or key personnel (generally defined as a reduction of 25% or more from the level anticipated in the approved application).
• Change in the effort of the PI or key personnel of less than 25% from the level in the approved application, if the change reflects a change in the work scope of the project.

• **Changes in PI Status:** When a PI plans to take a sabbatical, a leave of absence, or terminates his or her employment at Indiana University, the sponsor of any active sponsored award should be notified of the change of status. Notification of changes in status should be done in advance whenever possible but in no case later than 30 days after a PI change in status. Notifications and requests for approval to the sponsor should be routed through ORA.

• **Short-term absence of PI:** An absence of less than three months may require agency notification with arrangements for conduct of the project during the PI’s temporary absence.

• **Long-term absence of PI:** Generally an absence of three months or more will require agency notification and approval.

• **Withdrawal of PI:** In cases where a faculty member is transferring to another institution, it is normally the decision of the unit head (in cases where the PI is the unit head, the decision should be the unit head’s supervisor) as to whether IU will seek sponsor approval to retain the award and name a new PI or to seek sponsor approval to relinquish the award to the institution employing the transferring PI.

### Definitions

**Principal Investigator:** The Principal Investigator is the individual designated by the grantee, and approved by the sponsoring agency, who will be responsible for the scientific or technical direction of the project.

**Key Personnel:** The PI and other individuals who contribute to the scientific development or execution of a project in a substantive, measurable way, whether or not they receive salaries or compensation under the grant. Typically these individuals have doctoral or other professional degrees, although individuals at the masters or baccalaureate level may be considered key personnel if their involvement meets this definition. Consultants also may be considered key personnel if they meet this definition. “Zero percent” effort or "as needed" is not an acceptable level of involvement for key personnel.

**Sponsored Program:** Any activity that receives funding from outside the University. Sponsored projects may also be known as sponsored programs or sponsored agreements.

### Sanctions

Failure to adhere to this policy and procedures may result in the administrative suspension and/or termination of a sponsored program agreement and other actions.

### History

Replaces:

• Important Notice 07-2 “Change in Effort or Status of the Principal Investigator or other Key Personnel”

Previous Versions:

• Effective Dates: 4-25-2011 through 5-3-2017

### Related Information

- OMB 2 CFR part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- NIH Grants Policy Statement
- NSF Proposal and Award Policies and Procedures Guide