

Principal Investigator and Key Personnel Eligibility

Approved: 30Apr26

Administering Unit: Graduate School and Research

I. Purpose

The purpose is to establish guidelines for determining eligibility to serve as Principal Investigator (PI) and/or key personnel on sponsored projects. PIs and key personnel must meet the qualifications necessary to fulfill responsibilities established under 2 CFR Part 200 (*Uniform Guidance*), including programmatic oversight, financial stewardship, effort certification, and adherence to compliance and reporting requirements.

II. Definitions

Principal Investigator (PI): The individual with overall responsibility for the conduct of research or other activity described in a proposal, protocol, or an award, and/or the individual with fiduciary responsibility for award management.

Key Personnel: Individuals who provide critical leadership positions within the proposal (and consequently their intellectual guidance) or who provide unique expertise to the proposed scope of activity. Key personnel typically include principal investigators, research scientists, principal scientists and senior scientists, depending on their intellectual contribution to the proposed scope of activity. Typically, replacement of any of these individuals requires approval from the sponsor. Importantly, the status of key personnel does not necessarily imply salary support from the sponsor.

III. Eligibility

Only full-time employees of the university are eligible to serve as PI or co-PI on externally sponsored projects. Individuals must also:

- Have an appointment for the duration of the project or a WCU-approved plan for project continuity;
- Be able to commit and certify effort in accordance with 2 CFR 200.430;
- Meet sponsor-specific requirements for PI and key personnel eligibility;
- Not be debarred, suspended, or otherwise excluded from participation;
- Be in compliance with WCU's Conflict of Interest policy in accordance with 2 CFR 200.112.

The following table describes WCU's institutional eligibility categories:

Position	Can serve as PI or Key Personnel
Tenured and tenure track faculty	Yes
Fixed term faculty (Clinical / Teaching / Research / of Practice)	Yes, with approval by their department head and college dean.
Fixed term faculty (Instructor)	Yes, for non-research projects only (e.g., educational programs), with approval by their department head and college dean.
Adjunct faculty	No
Visiting faculty	Yes, with approval by the department head and college dean.
Affiliated faculty	No
Research staff	Yes
Post-doctoral staff	Yes, with approval for the specific project by their department head and college dean.
Students	No
Other staff	Yes, with approval by their dean or vice chancellor.