

## Criteria for Principal Investigator Eligibility and Criteria for Exceptions at the Geisel School of Medicine at Dartmouth

The parent policy which defines eligibility to serve as a Principal Investigator (PI) at Dartmouth College (Dartmouth) may be found at [The Office of Sponsored Projects site for policies](#).

Key to this policy is the criterion that only full-time faculty members or individuals holding full-time research positions (defined for each academic area in the Appendices found on this site) may routinely serve as PIs on sponsored projects. The Geisel School of Medicine (Geisel) defines full-time as individuals committed at  $\geq 0.8$  FTE.

The information set forth below builds upon this institutional policy to further define criteria and exemptions that may be specific to the Geisel (i.e., the "Geisel Appendix" referenced in the parent policy).

In 2016, Dartmouth and Dartmouth-Hitchcock (D-H) worked in collaboration to effect a migration of financial and administrative oversight of sponsored grants and contracts for faculty with primary appointments in Geisel's *clinical departments* (Anesthesiology, Community & Family Medicine, Medicine, Neurology, Obstetrics & Gynecology, Orthopaedics, Pathology & Laboratory Medicine, Pediatrics, Psychiatry, Radiology, and Surgery) to D-H, and further, that, except where exemptions have been granted<sup>1</sup> as of January 1, 2019, D-H shall be the submitting organization and grantee (or awardee) of record for such sponsored programs and shall be directly responsible for the compliance oversight, management, and resourcing of such projects.

Compliance oversight, management, and resourcing of projects arising out of Geisel's *foundational departments* (Biochemistry & Cell Biology, Biomedical Data Science, Epidemiology, Microbiology & Immunology, Molecular & Systems Biology, and the Dartmouth Institute for Health Policy and Clinical Practice; TDI) shall be retained by Dartmouth ([The Office of Sponsored Projects](#)).

As stipulated in the document entitled, Academic Appointments Promotions and Titles at the Geisel at Dartmouth ([APT document](#)), all full-time members of the faculty are expected to maintain a regular physical presence within the major campuses affiliated with Geisel during any quarter in which they are active (e.g., not on family leave etc.). Inherent, therefore, in this provision is also the requirement that any individual (faculty or non-faculty [NFA]) who is provided PI eligibility will also maintain a regular physical presence within the major campuses affiliated with Geisel (again, with exemptions granted for approved leave) over the course of the award's project period.

Criteria for PI eligibility set forth below reflect that faculty members of the Geisel who may be qualified to serve as PI may be employed by different entities (e.g., Dartmouth, D-H/Mary Hitchcock Memorial Hospital, or the White River Junction VAMC). Thus, the Criteria below apply to two specific situations:

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<sup>1</sup> At the time of the reorganization, Geisel (Dartmouth-College) and Dartmouth-Hitchcock came to agreement that the research programs of specific individuals within clinical departments would remain attributable and managed by Dartmouth College according to criteria Bi-iii established below.

- A. Individuals who are employees of Dartmouth: this includes Geisel faculty members and specific NFAs (*see below*) appointed in the foundational departments and a specific and limited set of faculty members who have retained appointments in clinical departments post-2016.
- B. Approved exemptions (*see below*) for faculty members in Geisel's *clinical departments* for their grants to be awarded to Dartmouth and for the oversight of those grants to reside in an identified and approved *foundational* department.

A. **Criteria for PI Eligibility for Employees of Dartmouth**

- (I) All members of the faculty of Geisel who are employees of Dartmouth and who hold the rank of Assistant Professor, Associate Professor or Professor, and who have not entered in to retirement agreements (e.g., Flexible Retirement Option [FRO] or Geisel Retirement Option [GRO]) are eligible to be PI on an extramurally funded grant or contract.
- (II) Senior and Principal Research Scientists/analysts/Engineers (i.e., NFAs) who are employees of Dartmouth are eligible to be PI on an extramurally funded grant or contract.
- (III) Individuals having the rank of Instructor or Research Scientist (basic level) who are employees of Dartmouth may be eligible to be PI on an extramurally funded grant or contract on a case-by-case basis with the specific permission of the Chair of their Department. Approval must also be requested and provided from the Dean's Office (Dean of Faculty Affairs/Executive Dean for Administration and Finance) at the time the proposal is first being considered, not simply at the time it goes forward in the queue for approval from the Chair to OSP. Please send the sponsor's description of the opportunity, a draft of the abstract, a brief description of proposed facilities/resources required for the project, and an updated CV of the proposed PI to the Dean of Faculty Affairs.
- (IV) Research Associates who are employees of Dartmouth may be eligible to be PI on an extramurally funded grant or contract on a case-by-case basis with the specific permission of the Chair of their Department. Approval must also be requested and provided from the Dean's Office (Dean of Faculty Affairs/Executive Dean for Administration and Finance) at the time the proposal is first being considered, not simply at the time it goes forward in the queue for approval from the Chair to OSP. Please send the sponsor's description of the opportunity, a draft of the abstract, a brief description of proposed facilities/resources required for the project, and an updated CV of the proposed PI to the Dean of Faculty Affairs.
- (V) Adjunct faculty of Geisel may be eligible to be PI on an extramurally funded grant or contract on a case-by-case basis with the specific permission of the Chair of their Department. Approval must also be requested and provided from the Dean's Office (Dean of Faculty Affairs/Executive Dean for Administration and Finance) at the time the proposal is first being considered, not simply at the time it goes forward in the queue for approval from the Chair to OSP. Please send the sponsor's description of the opportunity, a draft of the abstract, a brief description of proposed facilities/resources

required for the project, and an updated CV of the proposed PI to the Dean of Faculty Affairs.

- (VI) Emeritus/a faculty members (active status), retired faculty members (whether from Dartmouth, D-H or the VAMC), or faculty members who who have entered into a retirement agreement with the College (e.g., FRO) may be eligible to be PI on an extramurally funded grant or contract on a case-by-case basis with the specific permission of the Chair of their Department. Approval must also be requested and provided from the Dean's Office (Dean of Faculty Affairs/Executive Dean for Administration and Finance) at the time the proposal is first being considered, not simply at the time it goes forward in the queue for approval from the Chair to OSP. Please send the sponsor's description of the opportunity, a draft of the abstract, a brief description of proposed facilities/resources required for the project, and an updated CV of the proposed PI to the Dean of Faculty Affairs.

All other exemptions must be considered according to the exemption criteria set forth in the policies for Dartmouth ([OSP policy](#)).

**B. PI Eligibility Exemptions Related to the 2016 Reorganization of the Academic Enterprise in the Clinical Departments at Geisel**

In recognition that there are research activities which may inure to the benefit of our academic medical system as a whole, exceptions may be considered in granting permission for grants/contracts arising from PIs in *clinical departments* to be submitted and administered through Dartmouth, as grantee. Standing consideration will be given when:

- i. The primary resources (collaborations, facilities, etc.) used in support of the work solely exist at Geisel/Dartmouth and are not readily portable to D-H;
- ii. There are prescriptive regulatory guidelines (e.g., award must be issued through a degree granting institution);
- iii. Faculty/program retention issues where both parties agree retention is paramount.

For sponsored research projects where the faculty member (PI) has a primary appointment in a *clinical department* (normally oversight through Dartmouth-Hitchcock) wishes to submit a grant through a *foundational* department (oversight by Geisel/Dartmouth), the following shall apply:

1. The faculty member/PI must discuss the request to submit through the *foundational* department with the Chair of their primary appointing department;
2. The discussion should highlight for the Chair, and subsequently the Dean of Geisel and the CEO of D-H, the reason(s) why the PI believes the project would be better served as submitted through the *foundational* department, including any specific *foundational* departmental/Dartmouth commitments or other foundational departmental/Dartmouth resources that would be made available to support that work;
3. The appointing *clinical department* Chair agrees to allow the proposal to be submitted through the foundational department/Dartmouth, or not;
4. If the *clinical department* Chair does not agree to permit the proposal to be submitted through the *foundational* department/Dartmouth, that decision shall be considered final;

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5. If the appointing *clinical department* Chair agrees to permit the proposal to be submitted through the *foundational* department/Dartmouth, s/he shall make a recommendation to the Dean of Geisel and the CEO of D-H;
6. The Dean of Geisel and CEO of D-H shall consider the request and the endorsement of the PI's *clinical department* Chair and shall make the ultimate decision based on the merits and circumstances surrounding the proposal, including consideration of the resources and/or investments committed by the *foundational* department(s)/Dartmouth that would subsequently be responsible for the performance of the project, once awarded;
7. Dartmouth's [Office of Sponsored Projects](#); OSP will review and must agree that the assignment of the proposal to Dartmouth College as the grantee is consistent with Dartmouth policy and with the intent, restrictions, guidelines of the sponsor;
8. It is expected, in the cases of such exceptions, that the associated revenues (support for direct project expenses and F&A recoveries) would flow through to the *foundational* department committing to support this work;
9. Where necessary, subcontract agreements can be executed to allow for faculty/collaborators/staff for one institution to participate on grants held at the other (please see policy set out by Dartmouth's OSP);
10. It is contemplated that projects that involve clinical trials will not be considered under these exemptions;
11. It is contemplated that projects that would impose substantive risk on Dartmouth wherein it is judged that Dartmouth would not have appropriate capability for oversight (e.g., but not limited to, protocols that incorporated nuclear medicine) will not be considered under these exemptions;
12. If supported by all parties (departmental chairs, Dean of Geisel, CEO of D-H, OSP, sponsor, and the Provost), exceptions to provisions 10 and 11 may, in rare cases, be considered.

Note that an emphasis for CEO/Dean decision-making shall be on the commitment of the sponsoring *foundational* departmental resources and/or investment(s) that this department makes to support the performance of the award.

Note as well that this will apply to all grants identified as transferred to D-H as the grantee as part of the 2016-2018 restructuring of Geisel, that is, there will be no "grandfathering" of existing awards that may currently be supported by a *foundational* department unless otherwise approved as per steps #1 - #6, above.