

**EPA Implementation Plan for  
Policy on Multiple Principal Investigators  
for Federally Funded Research Projects  
(February 26, 2008)**

**Implementation History:** On January 4, 2005, the Office of Science and Technology Policy (OSTP) in the Executive Office of the President issued a memorandum to all Federal research agencies, requiring them to formally allow more than one Principal Investigator (PI) on individual research awards. A Request for Information soliciting input from the research community on several core issues related to recognizing multiple PIs was published in the Federal Register on July 18, 2005. Based on the information gathered in response to the Request for Information, the Environmental Protection Agency (EPA) has developed this implementation plan.

**Current Implementation Status:** Effective May 1, 2008, non-competitive applications and Requests for Applications (RFA) will uniformly allow more than one Principal Investigator (PI) to be identified on research grant and cooperative agreement applications (see Federal Register notice at <http://a257.g.akamaitech.net/7/257/2422/01jan20071800/edocket.access.gpo.gov/2007/pdf/07-4638.pdf>). Applications for awards to individuals, such as fellowships, will not accommodate more than a single PI. The restriction to a single PI will be described in solicitations as applicable.

The decision to apply for a single PI or a multiple PI grant/cooperative agreement will be the responsibility of the investigators and the applicant organization. Those decisions must be consistent with and justified by the scientific goals of the project. The multiple PI model will supplement, and not replace, the traditional single PI model to encourage multidisciplinary efforts and collaboration.

**1) EPA Definition of a Principal Investigator:**

- a. The individual(s) a research organization designates as having an appropriate level of authority and responsibility for the proper conduct of the research, including the appropriate use of funds and responsiveness to administrative requirements such as the submission of scientific progress reports to the Agency.
- b. Each PI is responsible and accountable to the applicant organization or, as appropriate to a collaborating organization, for the proper conduct of the project or program including the submission of all required reports.
- c. The presence of more than one identified PI on an application or award diminishes neither the responsibility nor the accountability of any individual PI.

**2) Designation of Contact PI:**

- a. EPA has selected the term Contact PI to designate that individual to whom Agency program officials will direct all communications related to scientific, technical, and budgetary aspects of the project including pre- and post-award

(such as submittal of progress reports to EPA) communications on the overall management of the assistance agreement.

- b. This designation does not confer any difference in scientific stature or authority to that person and does not mean that the Contact PI's only responsibilities are clerical in nature.
- c. PIs not identified as Contact PIs retain the responsibility and accountability for all components of the research.

### **3) Application Instructions:**

- a. The first PI listed on the Key Contacts Form must be affiliated with the institution submitting the application and will serve as the Contact PI. The Key Contacts Continuation Form must be completed and submitted for those applications identified as multiple PI.
- b. Specific agency funding opportunities or RFAs may require the development of a formal leadership plan describing areas of responsibility for each PI and how the team will function.
- c. Peer review will examine the roles and responsibilities, governance and organizational structure of the proposed leadership team and will determine whether team members have the necessary expertise to carry out the proposed project.

### **4) PIs at Different Institutions:**

For projects that include PIs at multiple institutions, the assistance award will be made to the institution of the Contact PI and funds will be allocated to collaborating institutions using subgrants/subawards. EPA generally does not allow recipients to make subawards to for-profit organizations. Transactions between recipients and for-profit organizations including individual consultants are, in almost all cases, subject to the competitive procurement requirements of EPA's grant regulations. Under very limited circumstances, subawards may be made to for-profit organizations only when consistent with Subpart B Section .210 of OMB Circular A-133.

### **5) Access to Review and Award Information:**

It is expected that Contact PIs will share all information provided by EPA regarding a multiple PI application. While EPA reserves the right to routinely provide information to only the Contact PI, any information regarding an application will be shared with any PI upon request.

### **6) Identification of All PIs in Public Data Systems:**

For projects that include multiple PIs, the EPA Grants Award Database located at <http://www.epa.gov/ogd/> will be enhanced at the next update to include these data fields. It is anticipated that this update will occur during FY09. ORD public data systems currently in place (specifically, NCER's web database of past and current awards located at <http://es.epa.gov/ncer/>) accommodate more than one PI. No changes to this database are necessary to implement the Multiple PI Policy.