**Criteria for Waiver for PI Status for Human Subject Research**

**(Effective December 1, 2013)**

**Principal Investigator Eligibility Policy**

Harvard University Schools have established eligibility criteria for the faculty to act as a Principal Investigator (PI) or Co-Principal Investigator (Co-PI) on externally funded projects. This “PI-eligibility” status is used as a proxy in other research-related policies such as the human subject research policy for students. The policy requires that students doing senior thesis or other independent research projects have a PI-qualified faculty sponsor. The Policy in part reads:

“*Since students are not eligible to serve as Principal Investigators, they must have a faculty sponsor who meets their school’s Principal Investigator eligibility criteria*”.

**Waiver of PI Status for Human Subject Research**

There are specific instances where faculty classified as lecturers, or similar titles, have substantial responsibilities for undergraduate education including serving as senior thesis advisors. However, because they do not meet the “PI-eligibility” criteria they are ineligible to be named as a faculty sponsor on a student project. This guideline establishes a process for waiver for a particular lecturer, or other faculty appointment holder, to be PI eligible for *the limited purpose of serving as a faculty sponsor for undergraduate student human subject research protocol submissions*. Being granted status as principal investigator for research projects involving human subjects does not imply that an individual may also serve as sole principal investigator for submission of proposals to external sponsors.

In order to be eligible:

1. The faculty member must be qualified to oversee the proposed research.
2. The waiver would only apply to undergraduate student projects that would be completed before the end of the faculty member's appointment term.
3. The faculty member must complete the requisite Human Subject Protection training.
4. The Department Chair or the Undergraduate Program Director must confirm that the faculty member is qualified to perform the duties assigned (e.g. mentoring, oversight of the research).
5. The Department Chair or Program Director and the appropriate Dean at the school must approve the waiver.

**Procedure**

In order to obtain approval:

1. Complete a copy of the Waiver of PI Status for Human Subject Research Request Form (see Attachment-1).
2. Obtain the Department Chair, or Director of Undergraduate Program Approval, as appropriate.
3. Obtain the Approval of appropriate Dean: in FAS, a Divisional Dean; in other schools, an Academic Dean or Faculty Dean.
4. Attach a copy of the approved Waiver for PI Status for Human Subject Research Form to the application for human subject research for which the faculty will act as a “faculty sponsor.