



Smithsonian Tropical Research Institute

To: STRI Staff and Research Associates

Subject: Clarification regarding when Research Associates can serve as Principal Investigators on sponsored project grants and contracts

Date: October 31, 2016

From: Matt Larsen, Director

Cc: Tracey Fraser, Office of Sponsored Projects
Eric Woodard, Office of Fellowships and Internships

The purpose of this memorandum is to provide clarification to STRI staff and Research Associates regarding when it is appropriate for a Research Associate (RA) to serve as the Principal Investigator (PI) on a sponsored project grant or contract.

Office of Sponsored Projects (OSP) and STRI have been reviewing these types of activities in recent months, and following SD-205, have determined that some additional requirements need to be in place in order for a STRI Research Associate to serve as a PI.

1. If you want to include salary for yourself in the grant/contract, you will need a work permit or must have Panamanian citizenship, and hence become a STRI employee for the period of your project. Be aware this will require significant advanced planning, and likely require independent legal counsel in Panama to obtain such status, as STRI does not provide such services.
2. If you cannot include salary for yourself in the grant/contract, an STRI employee must be willing to serve as your *Grant Sponsor* to oversee the management and execution of the project. The Grant sponsor will be responsible for ensuring the appropriate execution of the funding including, but not limited to, approving transactions, supervision of personnel, preparing performance plans, and performance appraisals, among other administrative tasks. Per SD 205 ("Research Associates") a *Grant Sponsor* is defined as:

"A Smithsonian employee who accepts responsibility for the management of a grant or contract in cases where the Research Associate who is designated as the Principal Investigator (PI) cannot be hired as a Smithsonian employee. For example, while a Research Associate may be awarded a grant for which he/she has applied as a PI, in some cases that grant may not include funding for the Research Associate to be hired as a Smithsonian employee. In such a case, the

Grant Sponsor would assume responsibility for managing the grant on behalf of the Smithsonian while the Research Associate remained an academic appointee but not an employee of the Smithsonian.”

3. You must generally **be physically present at STRI facilities to oversee the work on your project**. Note that you cannot appoint a current STRI employee as a ‘surrogate PI’ to perform this function for you, unless that STRI employee is truly a collaborator on your research, in which case they should be designated as a Co-PI.

If the Research Associate has a paid position at another organization while serving as a Smithsonian RA, the RA must discuss with the Deputy Director for Science, STRI Director, and OSP whether it would be more appropriate for the RA to submit the grant/contract proposal through their employer and include a subaward to the Smithsonian in the proposal budget for the work that would be done at STRI.

4. Alternative Solution to have funds available at STRI:

When there are no concerns about ownership of data or intellectual property (IP), the RA may choose to submit a proposal through the RA’s home organization and include costs for specific STRI expenses. These costs would be paid to STRI as a ‘vendor’ through an agreement or purchase order from the RA’s home organization paid directly to STRI. Note that STRI will add a 15% fee to such costs, and such agreements would be reviewed and negotiated by STRI Administration and not by OSP. If there are data or IP concerns, they would be more appropriately handled through an OSP-negotiated subaward. Again, contact STRI Administration or OSP for further guidance.

Finally, please keep in mind that **all proposed sponsored project activity (proposals to be submitted to government, foundations or industry), should first be vetted with Xenia Saavedra** before you contact the Office of Sponsored Projects. If you have further questions about this memorandum, you may contact STRIOSP@si.edu.