




# University of Pittsburgh

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**TO:** Deans, Directors, Department Chairs, and Regional Campus Presidents

**FROM:** George E. Klinzing, PhD, Vice Provost for Research 

**DATE:** April 7, 2011

**SUBJECT:** Potential Nepotism Involving University of Pittsburgh Faculty Serving as Principal Investigators (PI) and Co-Investigators (Co-I) on the Same Research Projects

The PI of a grant is responsible and accountable to the University and to the funding agency for the proper conduct of the work done under the funded project. When the PI and another investigator or staff member on the same grant are spouses, registered domestic partners, or otherwise members of the same immediate family or household, the University is required to manage the potential for nepotism.

The NIH (and other funding agencies) requires recipient institutions to have policies and standards in place to manage nepotism. (See [http://grants.nih.gov/grants/policy/nihgps\\_2010/nihgps\\_2010.pdf](http://grants.nih.gov/grants/policy/nihgps_2010/nihgps_2010.pdf).) The Nepotism Policy found in the University Faculty Handbook fulfills this requirement, and should be referred to by department chairs for guidance. (See <http://www.provost.pitt.edu/handbook/handbook.html>; II. Faculty Policies > Employment > Employment of Relatives—Nepotism.) Department chairs should exercise particular vigilance in cases where staff positions are occupied by immediate family members of the PI. If the department chair has the potential conflict, the dean must manage it.

While every situation is unique, the following options may be used to manage the conflict associated with the types of arrangements described above for federally-funded grants:

- The PI and Co-Investigator or staff member must disclose their familial relationship and their proposed roles on the grant to their department chair(s), who should determine whether the arrangement is an appropriate scientific collaboration;
- The PI must also disclose the relationship to the funding agency in the grant proposal, indicating that the potential conflict is being managed in accordance with the University's policies and procedures;
- When possible, an independent faculty member already listed as an investigator on the grant should oversee administrative and financial matters involving the Co-I (e.g., performance reviews, salary considerations, approval of expense reports, approval of SPARs). If no such person is available, an independent individual, such as the department chair, should perform this function;
- The Co-I's department chair, not the PI, is responsible for addressing any performance issues of the Co-I and for taking any appropriate disciplinary action.

**Note:** The responsibility to address nepotism issues rests with Deans, Department Chairs, and Center Directors. However, if the PI or Co-I is **outside** the University, or one of the family members is **University staff**, this gives rise to conflict of interest issues and the COI Office (412-383-2828) should be contacted because the situation will likely require conflict of interest management and oversight.

For any questions on this guidance, please do not hesitate to contact me. Thank you for your attention to this important matter.