PI/PD Guide to Identify "Investigators" Subject to PHS Financial Conflict of Interest (FCOI) Regulations

**PHS FCOI REGS APPLY TO ALL "INVESTIGATORS" ON A PROJECT**

**PRINCIPAL INVESTIGATORS** are responsible for:
1. Identifying "Investigators" on a proposal, award and modification to scope of work and
2. Ensuring "Investigators" take FCOI training and submit FCOI Disclosure Questionnaires on a timely basis.

Except for PIs/Co-PIs, title alone cannot determine who is an "Investigator." The significance of the person's role in the research is dispositive in your decision. However, these title-based guidelines can inform your consideration of the person's role.

**IDENTIFYING "INVESTIGATORS"**

Consider **TITLE** and **ROLE** in determining whether a person is an "Investigator" on a project.

**1-CONSIDERING TITLE**

**PI, Co-PI, PD, Co-PD** named in the proposal for funding, the award or in a subaward, subgrant, subcontract, progress report or an award modification

**Postdoc or Grad Student** paid on fellowships and their Faculty Sponsor

**Always considered an "Investigator"**

**Postdoc on research grant**

**Sometimes considered an "Investigator"**

**Grad Student on research grant**

**Rarely considered an "Investigator"**

**Other Personnel** (Lab Tech, etc.)

**Sometimes considered an "Investigator"**

**Consultant**

**Collaborator**

**2-CONSIDERING ROLE**

The person's role is significant enough that they are considered an "Investigator" if:

- The person has independent responsibility for their contributions to the design, conduct or reporting of research, or
- The person has a level of responsibility so that they can have a meaningful impact on the results of the research, or
- The person directly contributes to the scientific development or execution of a project in a substantive, measurable way.

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