PI/PD Guidance for Identifying "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 and award and
2. Ensuring "Investigators" take FCOI training and submit FCOI Disclosure Questionnaires on a timely basis.

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, 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.)

Consultant

Sometimes considered an "Investigator"

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.

PHS and AU Procedures define "Investigator" as the project director or principal investigator and any other person regardless of title or position, who is responsible for the design, conduct, or reporting of research funded by the PHS, or proposed for such funding, which may include, for example, collaborators or consultants.

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.

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