

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

Research sponsored by PHS or Other Sponsors? This does not apply! Look for PI Guides on the AU FCOI webpages for PHS or AU FCOI Policy.

NSF FCOI STANDARDS 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" submit FCOI Disclosure Questionnaires on a timely basis.

NSF and AU Procedures define "Investigator" as the principal investigator, co-principal investigators/co-project directors, and any other person at the University who is responsible for the design, conduct, or reporting of research or educational activities funded or proposed for funding by NSF.

IDENTIFYING "INVESTIGATORS"

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

Except for PIs, Co-PIs and Co-PDs, title alone cannot determine who is an "Investigator." The significance of the person's role in the research or educational activities is dispositive in the "Investigator" determination. However, these title-based guidelines can inform consideration of the person's role.

1-CONSIDERING TITLE

2-CONSIDERING ROLE

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?

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

Always considered an "Investigator"

The person has independent responsibility for their contributions to the design, conduct or reporting of the research or educational activities,

or

The person has a level of responsibility so that they can have a meaningful impact on the results of the research or educational activities,

or

The person directly contributes to the scientific development or execution of the project in a substantive, measurable way.

Senior/Key Personnel?

Postdoc or Grad Student?

Other Personnel (Lab Tech, etc.)?

Consultant?

Collaborator?

Sometimes considered an "Investigator"

Rarely considered an "Investigator"

Sometimes considered an "Investigator"

Role?

Role?

Role?