

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.

IDENTIFYING "INVESTIGATORS"

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

PHS and AU Procedures define "Investigator" as the project director, 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 and Senior/Key Personnel, title alone cannot determine who is an "Investigator." The significance of the person's role in the research 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 or Senior/Key Personnel 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 fellowship 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?

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 the project in a substantive, measurable way.