Determination of Investigator

Significant Financial Interests (SFI) applies to all individuals defined as project investigators. Individuals who qualify as “investigators” may extend beyond a project's principal investigator(s) and may include students, subcontractors, guarantees, consultants, and/or other collaborators.

To assist you in determining whether an individual participating in this research project qualifies as an investigator, and should disclose their Significant Financial Interests (SFI), use the check list below.

1. Is the individual responsible for the design of the research?  □ YES □ NO
2. Is the individual responsible for the conduct of the research?  □ YES □ NO
3. Is the individual responsible for the reporting of the research?  □ YES □ NO
4. Is the individual responsible for the programmatic outcomes of the research?  □ YES □ NO
5. Will the individual be an author on any publication related to the research?  □ YES □ NO
6. For Students: Will the student be independently responsible for the design, conduct of reporting of the research without direct supervision of someone who is an investigator? □ YES □ NO

If you have answered “Yes” to any of the questions above, the individual fits the definition of investigator and is subject to the SFI regulation. Please include the individual in the “Financial conflict of Interest - Investigators” portion of the worksheet.

If the proposal is to be submitted to NIH or another PHS agency sponsor, the disclosure of Significant Financial Interests must also include reimbursed or sponsored travel associated with University Responsibilities provided by certain third-parties.

Anyone meeting the definition of "investigator" must disclose their Significant Financial Interest and travel prior to submission of the proposal to the sponsor.

Please note that a person's role in a project may change over time and may need to be reevaluated to determine investigator status (e.g., in the case of a student involved in a project over an extended period who eventually progresses to a more substantial role). If you have questions about the definition of an investigator or the applicability of the SFI regulation, please contact your Pre-Award Center.