

# Determination of Investigator

Definition: An “Investigator” is a person responsible for the design, conduct, and/or reporting of research.

The requirement to disclose project/institutional responsibilities related 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, guarantors, 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, use the check list below.

1. Is the individual responsible for the design of the research project? YES or NO
2. Is the individual responsible for the conduct of the research project (i.e., does the individual perform experiments and/or uncover new knowledge/understanding based on theory/computation/simulation)? YES or NO
3. Is the individual responsible for the reporting of the research (e.g., present research findings at meetings/conferences, or become an author on publications resulting from the research project)? YES or NO
4. Is the individual responsible for the programmatic outcomes of the research project? YES or NO
6. For students/trainees participating in the research project: Will the student/trainee be independently responsible for the design, conduct, or reporting of the research without direct supervision of someone who is an investigator? YES or NO

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If you have answered “Yes” to any of the questions above, the individual fits the definition of investigator and is subject to the FCOI regulations. Please include all individuals that meet the definition of Investigator 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/trainee involved in a project over an extended period who eventually progresses to a more substantial role and may become an author on publications). Whenever new Investigators join the project, or a person not previously designated as Investigator achieves Investigator status, please contact your Pre-Award Center to add the new Investigators to your project record. If you have questions about the definition of an investigator or the applicability of the FCOI regulations, please also contact your Pre-Award Center.