

## Guidance for Identifying PHS Investigators – Adhering to PHS Conflict of Interest

Title and/or Role	Senior/Key Personnel *	Investigator **	USA Guidance
<b>PI/PD Principal Investigator/ Program Director</b>	Always	Always	Includes multi-PIs.
<b>Co-Investigator</b>	Always	Always	Are named at the PI/PD discretion. Are involved with the PI/PD in the scientific development or execution of a project. May include research scientists, senior research scientists and senior postdoctoral associates. The designation of a co-investigator, if applicable, does not affect the PI/PD roles and responsibilities.
<b>Graduate or Postdoctoral Fellows paid on fellowships</b>	Always	Always	
<b>Sponsor for Postdoctoral or Graduate Fellows</b>	Always	Always	
<b>Graduate or Postdoctoral Fellows paid on training grants</b>	Never	Never	
<b>Postdoctorals paid on research grants</b>	Sometimes	Only if Senior/Key	<p>In most instances, postdoctorals, while engaged in research, do so under the guidance and mentorship of a PI and do not meet the criteria necessary to be categorized as Senior/Key.</p> <p>PI's should be judicious in</p>

			identifying senior/key personnel..
<b>Graduate Students</b>	Rarely	Only if Senior/Key	Only in rare circumstances would a graduate student meet the criteria of Senior/Key. They are in training and conduct research under the guidance and mentorship of a PI
<b>Other Significant Contributors</b>	Never	Never	Usually included with "Effort of zero person months" or "as needed." Per NIH, these are not acceptable levels of involvement for those designated as Senior/key Personnel.
<b>Consultants</b>	Infrequently	Only if Senior/Key	Consultants are individuals who generally provide a 'fee for service' and do not typically conduct research. They may provide insight/expertise to the PI but independently are not responsible for the design, conduct or reporting of research.

			If a non-USA employee is responsible for conducting research, that research should be conducted through their home institution and they should be included in the proposal as a subrecipient and, as such, are entitled to IP rights. The PI on a subaward is considered an PI, as defined by the PHS regulations.
<b>Collaborators (unpaid)</b>	Never	Never	Unpaid collaborators do not contribute measurable effort, do not meet the criteria of Senior/Key personnel.
<b>Collaborators (paid) <i>at USA</i></b>	Sometimes	Only if Senior/Key	
<b>Collaborators (paid) <i>at Another Institution</i></b>	Never	Never	Should be included in the proposal as a subrecipient. May be an PI at his/her home institution
<b>Subrecipient PIs and Senior/Key Personnel</b>	Always	Always	USA requires that subrecipient Investigators comply with the FCOI policy of their home institution. To designate the

lead investigator at a subaward, the role of Subaward PI (instead of Co-Investigator) should be used. Select “Other” for the Project Role field and then insert the appropriate role descriptor in the Other Project Role field.

*Adapted from MIT*

**\*Senior/Key Personnel:** As identified in the grant application, progress report, or any other report submitted to the PHS. The program director/principal investigator (PD/PI) and other individuals who contribute to the scientific development or execution of a project in a substantive, measurable way, whether or not they request salaries or compensation.

**\*\*Investigator:** 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.