

PHS FCOI: Identifying Investigators

PHS FCOI regulations apply to all individuals who are investigators¹ for a PHS-funded project. Those who may qualify as investigators are not limited to PIs/PDs and co-investigators, and PIs are responsible for identifying who meets the definition. The table below is intended to assist in making a determination.

Project Title/Role	Investigator (per PHS definition)	Guidance
Principal Investigator (PI) or Project Director (PD)	Always	PIs/PDs are always subject to FCOI requirements.
Co-investigator	Always	Co-investigators are involved in the scientific development and conduct of a project. They may work for the university or another institution. They are most commonly faculty or staff but may also be students.
Graduate student	Sometimes	For most projects, a student is in training and conducts research under the guidance and mentorship of a PI, and would not be considered an investigator. However, if they are designated as a co-investigator or senior/key personnel ² , <i>or</i> they are independently responsible for the design, conduct, or reporting for a portion of the project, they are considered an investigator subject to FCOI requirements.
Undergraduate student	Rarely	For most projects, a student is in training and conducts research under the guidance and mentorship of a PI, and would not be considered an investigator. However, if they are designated as a co-investigator or senior/key personnel for a project, <i>or</i> they are independently responsible for the design, conduct, or reporting for a portion of the project, they are considered an investigator subject to FCOI requirements.
Postdoctoral student	Sometimes	Very often, postdocs engaged in research are in training and work under the guidance and mentorship of a PI, and would not be considered an investigator. However, if they are designated as a co-investigator or senior/key personnel, <i>or</i> they are independently responsible for the design, conduct, or reporting for a portion of the project, they are considered an investigator subject to FCOI requirements.
Consultant	Rarely	A consultant generally provides a specific service for a fee. Their work may provide insight and expertise, but they are not responsible for research design, conduct, or reporting. Thus, in most cases they are not an investigator. However, if they will be responsible for research design, conduct, or reporting, they may be more accurately classified as senior/key personnel, and would be an investigator subject to FCOI requirements. Consult with ORSP for help determining whether an individual is a consultant or senior/key personnel.
Subrecipient PI/PD or co-investigator	Always	PIs/PDs or co-investigators at subrecipient institutions are always subject to FCOI requirements.
Other collaborators	Sometimes	If a collaborator (internal or external) is senior/key personnel <i>or</i> is independently responsible for the design, conduct, or reporting for a portion of a project, they are an investigator subject to FCOI requirements. However, there are those who would <i>not</i> typically qualify as investigators; examples include administrative/clerical staff, lab technicians, student assistants, and consultants or colleagues that provide a specific expertise/service.

¹ **Investigator:** An individual, regardless of title or position, who is responsible for the design, conduct, or reporting of research proposed to or funded by a PHS agency.

² **Senior/key personnel:** Identified as such in a grant application or subsequent reports to the funding agency. They contribute to the development or execution of a project in a substantive, measurable way regardless of whether they are paid for their effort. The PI/PD is responsible for identifying senior/key personnel throughout the course of a project and ensuring they are aware of and in compliance with FCOI requirements.