

## PHS Financial Conflict of Interest: Determination of Investigator Status Checklist

The Public Health Service (PHS) Financial Conflict of Interest (FCOI) regulation 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, subgrantees, consultants, and/or other collaborators engaged in PHS-funded research. To assist you in determining whether an individual participating in a research project qualifies as an investigator, use this checklist to determine their status. If you respond "yes" to any of the questions below, the individual fits the definition of an investigator and is subject to the PHS FCOI regulation.

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?  Yes  No
5. Is the individual being compensated with PHS funds?  Yes  No
6. Will the individual be a collaborator on a publication related to the research?  Yes  No
7. For students: Will the student be independently responsible for the design, conduct, or reporting of the research without direct supervision of someone who is an investigator?  Yes  No

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 PHS FCOI regulation, please contact the Office of Research & Sponsored Programs.