

Are You a NIH Investigator?

An NIH Investigator means 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 NIH, or proposed for such funding. This includes collaborators, consultants, students, and trainees.

In interpreting the NIH definition of “Investigator”, PHSA is following the same guidelines, as used in determining who is in scope of the *Research Conflict of Interest Policy AB 207*.

One of the differences between the NIH disclosure requirement and the PHSA Policy scope is that NIH requires students and trainees who are responsible for the design, conduct, or reporting of research to submit a COI declaration form. The PHSA policy states that this group only needs to submit a declaration form if they know of a conflict.

To determine if you are a NIH Investigator, consider the following:

Are you responsible for

1. study planning,
2. data analysis,
3. data interpretation or manuscript writing,
4. decision-making in research, and/or
5. research outcomes,

AND

6. **Significantly independent in your role(s).**

If you answered “yes” to any of one questions 1-5 and “yes” to 6, then you would be included as a NIH Investigator and, therefore, have to comply with NIH regulations.

If you are acting solely in an administrative role, you bring information forward but do no more than that, and/or you are not responsible for the design, conduct, or reporting of NIH-funded research then you are not a NIH Investigator.