

Are You a NIH Investigator?

An NIH investigator means the project director or principal investigator or 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](#).

One of the differences between the NIH disclosure statement and the PHSA Research Conflict of Interest 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. PHSA Policy states that this group only needs to submit a declaration form if they know of a conflict.

How to Determine if You Are Considered a NIH Investigator

Consider the following:

1. Are you responsible for:
 - a. Study planning
 - b. Data analysis
 - c. Data interpretation or manuscript writing
 - d. Decision-making in research
 - e. Research outcomes

2. Are you significantly independent in your role(s)?

If you answered “Yes” to any of the items in Question 1 **and** “Yes” to Question 2, then you are considered a NIH investigator and, therefore, must comply with NIH regulations.

Note: 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 considered a NIH investigator.

Updated: March 6, 2024