Determining Who is an “Investigator”
For the Purpose of Complying with Policy on Conflict of Interest

(See also MSU Policy on Conflict of Interest for Faculty/Academic Staff)

MSU’s Policy on Conflict of Interest requires that research investigators make an annual disclosure of significant financial interests (SFIs) related to their institutional responsibilities. (See coi.msu.edu for more information on which interests must be disclosed, how to disclose, etc.) The intent of the policy is to ensure that the design, conduct, and reporting the results of research will not be biased by personal interests of responsible investigators.

“Investigator” means the Project Director (PD), Principal Investigator (PI), senior/key personnel and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting the results of research and other sponsored projects.

Individuals designated as investigators by subrecipient organizations for PHS/NSF projects are also subject to conflict of interest requirements. This is enforced by the subrecipient organization if they have a PHS/NSF-compliant policy, or by MSU.

Identifying Individuals on eTransmittals:

The eTransmittal is the internal electronic approval form required for submitting an application for a sponsored project. The PD, PI or other person completing the form must make sure that each person identified on the sponsor’s budget submission is also included in the eTransmittal. The person completing the eTransmittal should be aware that:

- Each person identified in the “Senior Key Personnel” section of the eTransmittal is considered to be an investigator and will be required to disclose related SFIs prior to submitting the application.
- Each person identified in the “Project Participants” section of the eTransmittal with any of the following “Participant Types” will be required to disclose related SFIs prior to submitting the application:
  - Investigator: Key Personnel
  - Investigator: Postdoctoral Researchers/Scholar
  - Investigator: Pre/Postdoctoral Fellow
  - Investigator: Postdoctoral Staff
  - Investigator: Student
  - Investigator: Technical Staff
  - Investigator: Consultant

If a non-investigator participant is later determined to be responsible for the design, conduct, or reporting of results of research or other sponsored project, they will be required to disclose SFIs at that time.

If other than the PD/PI, the person completing the eTransmittal must consult with the PD/PI to appropriately identify each person on the eTransmittal.

Determining Who is an Investigator:

PDs/PIs making the determination whether an individual included in their project is an investigator should consider the individual’s role, rather than title (whether paid or unpaid) and the degree of independence with which the individual works. The following criteria should be considered when making this determination:

- Nature of the specific contributions by the individual to the design (including conception), conduct (e.g., data collection, analysis, and interpretation), or reporting of the results (preparing, revising, and presenting intellectual content both publically and privately, progress or final reports to the funder) of research and other sponsored projects;
- Degree of independence in determining or guiding the direction of specific contributions; and
- Degree of supervision and oversight of the individual.

The responsible PD or PI should be prepared to justify their determinations upon request.
It is important to remember that all contributors, whether investigators or not as defined here, are guided by the principles of honesty and accuracy and subject to research misconduct rules. Providing false information about the occurrence of a conflicting interest might be justification for alleging research misconduct; however, the simple existence of a conflicting interest should not be considered a misdeed.

Even if individuals are not deemed to be an investigator under the Conflict of Interest Policy, PDs and PIs should communicate clearly about the importance of exercising good judgment and openness in all research endeavors. If a personal interest of any type for any contributor to the research process could appear to bias research judgment, then openness is urged in reporting the situation.

Contact:

For consultation and assistance, please contact:

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