## Investigator Disclosure Requirements



Conflict of Interest Program Jouett Hall 2301 S. Third Street Louisville, KY 40292

The revised COI regulations specify that investigators must complete the disclosure requirement at time of proposal and also have any identified COIs under management before any award funds are activated. The issue typically arises in the narrow application of the term 'Investigator' at the institutional level while the regulations impose a more global use of the term.

**Investigator** is any project personnel, regardless of actual title, who has the authority to make independent decisions about the design, conduct, proposing or direction of the research and the subsequent conclusions about the results and / or likely to be authors on manuscripts or to present research findings.

Individuals that fall in the below categories can have Tenure, Non-Tenure, Adjunct, Emeritus, Gratis or Visiting Appointments. In addition to the above, the following roles **will be** subject to the time of proposal / award establishment disclosure requirements:

- Principal Investigator
- Multiple Investigator
- Co-investigator
- Sub-Investigator
- Senior Personnel
- Key Personnel
- Fellows on Individual Fellowship grants
- Mentors on Individual Fellowship grants
- Mentors identified on institutional training grants
- Sub awardees / Sub recipients (whether following U of L policy or that of their home institution)

The following roles **may be** subject to the time of proposal / award establishment disclosure requirements:

- Collaborators
- Consultants
- Research Staff
- Students
- Trainees

In the absence of a defined scope of work for the above classes of project personnel, the disclosure requirement **will** prevail.