



Guidance for Identifying PHS Investigators

PHS defines Investigator as 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 [PHS-funded research](#), or proposed research. Investigators may include collaborators or consultants.

Principal Investigators (PIs) are responsible for appropriately identifying individuals who meet this definition for each proposal and award. The NIH definition of senior/key person and Investigator are closely related. To assist with appropriate identification of Investigators, we have developed an Investigator Matrix that summarizes titles and roles and offers guidance to PIs. **Note that this matrix is provided for guidance purposes only; PIs must still make a determination on a case-by-case basis.**

Title and/or Role	Senior/Key Personnel *	Investigator **	Guidance
PI (Principal Investigator)/ PD (Project Director)	Always	Always	Includes multi-PIs.
Co-Investigator	Always	Always	Are named at the PD/PI's discretion. Are involved with the PD/PI in the scientific development or execution of a project. May include research scientists, senior research scientists and senior postdoctoral associates, although this is not common. The designation of a co-investigator, if applicable, does not affect the PD/PI's roles and responsibilities.
Graduate or Postdoctoral Fellows paid on fellowships (vs. research grants)	Always	Generally	
Sponsor for Postdoctoral or Graduate Fellows	Always	Sometimes	
Graduate or Postdoctoral Fellows paid on training grants	Rarely [†]	Rarely [†]	
Postdoctorals paid on research grants	Sometimes	Sometimes	In most instances, postdoctorals, while engaged in research, do so under the guidance and mentorship of a PI and do not meet the criteria necessary to be categorized as Senior/Key and/or Investigator. PIs should be judicious in identifying senior/key personnel. Misidentifying personnel as senior/key unnecessarily increases burden for the preparation of the application, submission of Just-in-Time information and annual reporting requirements, in addition to FCOI disclosure.
Graduate Students paid on research grants	Rarely [†]	Rarely [†]	Only in rare circumstances would a graduate student meet the criteria of Senior/Key. They are



			in training and conduct research under the guidance and mentorship of a PI.
Other Significant Contributors	Never	Rarely [†]	These individuals are typically included with "Effort of zero person months" or "as needed." Per NIH, these are not acceptable levels of involvement for those designated as Senior/Key or Investigator.
Consultants	Rarely [†]	Rarely [†]	<p>Consultants are individuals who generally provide a 'fee for service' and do not typically conduct research. They may provide insight and expertise to the PI but independently are not responsible for the design, conduct or reporting of research. In most cases, they do not meet the definition of Investigator.</p> <p>If a non-Harvard employee is responsible for conducting research, that research should be conducted through their home institution, and they should be included in the proposal as a subrecipient and, as such, are entitled to intellectual property rights. The PI on a subaward is considered an Investigator, as defined by the PHS regulations.</p>
Collaborators (unpaid)	Never	Rarely [†]	Unpaid collaborators do not contribute measurable effort and do not meet the criteria of Senior/Key.
Collaborators (paid) at Harvard	Sometimes	Sometimes	
Subrecipient PIs	Always	Always	Harvard requires that subrecipient Investigators comply with the FCOI policy of their home institution if a PHS-compliant FCOI policy exists. However, GMAS must still include subrecipient PIs as Investigators for FAS/SEAS PHS projects.

***Senior/Key Personnel:** As identified in the grant application, progress report, or any other report submitted to the PHS. The program director/principal investigator (PD/PI) and other individuals who contribute to the scientific development or execution of a project in a substantive, measurable way, whether or not they request salaries or compensation.

****Investigator:** The PD/PI and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of research funded by the PHS, or proposed for such funding, which may include, for example, collaborators or consultants.

† Rarely: This level of frequency for individual Investigator determinations still requires evaluation by the PI in order to more sufficiently determine who is responsible for the design, conduct, or reporting of the research.