Guidance for determining applicability of the fCOI policy based on project roles

Investigator/Research Personnel: The project director or principal investigator, Co-PI, Co-I, or equivalent, anyone named on a “Key Personnel” list and anyone else who the PI and Co-PIs determine have independent responsibility for the design, conduct or reporting of the research.

The following is a list of the most common project roles/titles and the associated COI reporting/disclosure responsibilities:

### Always required to file disclosures (and meet PHS-specific disclosure and training requirements if PHS funded) with Cornell:

- Project Director or Principal Investigator, Project leader or anyone with similar overall responsibility for the design and execution of the project
- Co-Investigator, Co-Principal Investigator, Co-Project Director or anyone with similar responsibility
- Graduate or Postdoctoral Fellows paid on fellowships specifically supporting the Fellow’s project
- Mentor/PI/Sponsor for Postdoctoral or Graduate Fellow
- Anyone named on a “Senior or Key Personnel” list if one is required by the sponsor in a proposal, award, or progress report.

### Always required to fulfill sub-award recipient requirements:

- Sub-award recipient PI, Co-PI, Co-I, Senior or Key Personnel, or other role noted/similar to above.

### Not required to submit disclosures unless PI and Co-PIs determine that individual has independent responsibility for the design, conduct or reporting of the research:

- Graduate or Postdoctoral Fellow on training grant
- Graduate Student (GRA, RA)
- Undergraduate student
- Other Significant Contributor (OSC)
- Consultant, vendor, or contractor (paid through procurement process)
- Unpaid collaborator
- Cornell collaborators
- Cornell research support staff (ex: technician, accountant, administrator)