

<p>Title and/or Role</p>	<p>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.</p>	<p>Investigator 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 research funded by the PHS, or proposed for such funding, which may include, for example, collaborators or consultants.</p>	<p>MIT Guidance</p>
<p>PI/PD Project Director or Principal Investigator</p>	<p>Always</p>	<p>Always</p>	<p>Includes multi-PIs.</p>
<p>Co-Investigator</p>	<p>Always</p>	<p>Always</p>	<p>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.</p>
<p>Graduate or Postdoctoral Fellows paid on fellowships</p>	<p>Always</p>	<p>Always</p>	
<p>Sponsor for Postdoctoral or Graduate Fellows</p>	<p>Always</p>	<p>Always</p>	
<p>Graduate or Postdoctoral Fellows paid on training grants</p>	<p>Never</p>	<p>Never</p>	
<p>Postdoctorals paid on research grants</p>	<p>Sometimes</p>	<p>Only if Senior/Key</p>	<p>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. Principal Investigators 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.</p>
<p>Graduate Students (RAs)</p>	<p>Rarely</p>	<p>Only if Senior/Key</p>	<p>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</p>

Other Significant Contributors (OSCs)	Never	Never	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 Personnel.
Consultants	Infrequently	Only if Senior/Key	<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-MIT 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	Never	Unpaid collaborators do not contribute measurable effort, do not meet the criteria of Senior/Key personnel. They should be included as OSCs.
Collaborators (paid)			
At MIT	Sometimes	Only if Senior/Key	
At another institution	Never	Never	Should be included in the proposal as a subrecipient. May be an Investigator at his/her home institution
Subrecipient PIs and Senior/Key Personnel	Always	Always	MIT requires that subrecipient Investigators comply with the FCOI policy of their home institution. To designate the lead investigator at a subaward or consortium site, the role of Subaward Investigator (instead of Co-Investigator) should be used. Select "Other" for the Project Role field and then insert the appropriate role descriptor in the Other Project Role field.