

UCSF Conflict of Interest in Research Guidance: Determining Investigators on a Project

Per UCSF's [Conflict of Interest Policy](#), all UCSF investigators are required to annually disclose their significant financial and personal interests in Research Gateway (accessible via MyAccess).

Who is an “investigator,” for purposes of this policy?

An “investigator” is any person who shares in the responsibility of the design, development, testing, evaluation, conduct, reporting, review, or oversight of a program of scientific inquiry.

- Titles and positions **do not matter**.
- The term “investigator” is **not limited** to principal investigators, co-principal investigators, co-investigators, project directors, co-project directors, or senior/key personnel.
- The primary factors to be considered when determining who is an investigator on a project are the **significance of the tasks assigned** and **the degree of independence** with which the tasks are performed.

Investigators



- Most individuals paid under the research project, assuming they are contributing to the substance of the research and not solely performing administrative support.
- Individuals responsible for the design, development, testing, evaluation, conduct, reporting, review, or oversight of a program of scientific inquiry.
 - This can include students, trainees/postdocs, collaborators, volunteers, clinical research coordinators, and consultants.
- Individuals directly involved in the research intervention or consenting or evaluation of human research subjects.

Non-Investigators



- Individuals who only participate in a purely ancillary manner on a project.
- Administrative staff who provide only routine or supportive tasks and do not make direct and significant contributions to the research data.
- Typically, undergraduate students, technicians, or other individuals when their participation in UCSF research is closely supervised.