

PI/PD Guide to Identify "Affected Employees" on Sponsored Research Subject to the AU Financial Conflict of Interest (FCOI) Policy

Research sponsored by PHS or NSF? This does not apply! Look for PI Guides on the AU FCOI webpages for PHS or NSF.

AU's FCOI POLICY APPLIES TO ALL "AFFECTED EMPLOYEES" ON A PROJECT

PRINCIPAL INVESTIGATORS ARE RESPONSIBLE FOR:
 1) Identifying "Affected Employees" on an award and modification to scope of work *and*
 2) Ensuring "Affected Employees" submit FCOI Disclosure Questionnaires on a timely basis.

AU FCOI Procedures define "Affected Employees" as "Faculty (as outlined in the Faculty Handbook) and other employees responsible for the design, conduct or reporting of sponsored Research....This could include, but is not limited to, tenure and non-tenure track faculty, post-doctoral fellows, and/or graduate students."

IDENTIFYING "AFFECTED EMPLOYEES"

Consider TITLE and ROLE in determining whether a person is an "Affected Employee" on a sponsored project.

Except for PIs/Co-PIs, title alone cannot determine who is an "Affected Employee." The significance of the person's role in the research is dispositive in your decision. However, these title-based guidelines can inform your consideration of the person's role.

1-CONSIDERING TITLE

2-CONSIDERING ROLE

Not an AU Employee (Consultant, Collaborator, etc.)



The person's role is significant enough that they are considered an "Affected Employee" IF:

PI, Co-PI, PD, Co-PD named in the proposal for funding, the award or in a subaward, subgrant, subcontract, progress report or an award modification

Postdoc or Grad Student paid on fellowships and their Faculty Sponsor/Mentor

Always considered an "Affected Employee"

Faculty on research grant



Research Fellow, Research Associate, Postdoc or Grad Student on research grant



Other AU Employee (Lab Tech, Extension Agent, etc.)



The person has independent responsibility for their contributions to the design, conduct or reporting of research,

The person has a level of responsibility so that they can have a meaningful impact on the results of the research,

The person directly contributes to the scientific development or execution of a project in a substantive, measurable way.