

Title/Role	Require COI/COC Disclosure?	Comments
Principal Investigator (PI)	Always	
Co-Investigator/Co-PI	Always	
Project Managers/Project Coordinators	Rarely	Project managers and coordinators typically operate under the direction of the PI and do not have independent responsibility for any design, conduct, or reporting of the activity.
Laboratory Managers/Technicians	Rarely	Laboratory managers and technicians typically operate under the direction of the PI and do not have independent responsibility for any design, conduct, or reporting of the activity.
Graduate/Postdoctoral Fellows paid on fellowships	Always	
Graduate/Postdoctoral Fellows paid on training grants	Never	
Faculty Sponsor for Graduate/ Postdoctoral Fellows	Always	
Postdoctoral Fellows paid on research grants	Rarely	Postdoctoral Fellows (Postdoctoral Research Associates, Postdoctoral Research Fellows, Postdoctoral Fellows, etc.) are typically considered in training and conduct research under the guidance and mentorship of a PI and do not meet the criteria necessary to be categorized as Investigators. Note that Postdoctoral Fellows paid on fellowships and training grants are considered separately above.
Graduate Students	Rarely	Graduate students are typically considered in training and conduct research under the guidance and mentorship of a PI. Note that Graduate Fellows paid on fellowships and training grants are considered separately above.
Undergraduate Students	Rarely	Undergraduate students are typically considered in training and conduct research under the guidance and mentorship of a PI.
Other Significant Contributors (OSC)	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 Key Personnel.
Program Evaluators	Never	
Consultants	Rarely	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 criteria of Investigator.
Collaborators (unpaid)	Never	Unpaid collaborators do not contribute measurable effort, and therefore do not meet the criteria of Investigator. They should be included as OSCs.
Collaborators (paid) at ODU	Rarely	Most paid collaborators at GVSU will generally not meet the criteria of Investigator. However, Small Business Innovation Research (SBIR) and Small Business Technology Transfer (STTR) PIs are considered collaborators while also meeting the criteria of Investigator, and therefore require COI/COC disclosure.
Collaborators (paid) at another institution, including subrecipient PIs and senior/key personnel	Sometimes	Paid collaborators at another institution should be included in the proposal as a subrecipient. Disclosure to ODU is only required when collaborating entities have agreed to follow ODU's COI/COC policy as a condition of the subrecipient agreement.