

**Who meets the “researcher” definition and when must a non-OHSU collaborator complete OHSU’s Col disclosure?**

- **Research is defined as** a systematic investigation, including research development, testing, and evaluation, designed to develop or contribute to generalizable knowledge. As used in OHSU policies, the term "research" encompasses basic and applied research and product development.
  
- **Who is generally included in the definition of “researcher” ?**
  - Conducting Research means, with respect to a research protocol, designing research, directing research or serving as the principal investigator, enrolling research subjects (including obtaining subjects' informed consent) or making decisions related to eligibility to participate in research, analyzing or reporting research data, or submitting manuscripts concerning the research for publication.
  
  - **What about students?** Students would also be required to submit a Conflict of Interest disclosure if they are involved in the design, conduct or reporting of research per the above definitions.
  
- **Outside collaborators** who are covered by their own institution’s Col policy (which must be compliant with the federal regulation- 45 CFR Part 94) are generally not required to also file an OHSU Col disclosure.
  - Outside collaborators who are not covered by their own institution’s policy, or whose institution does not have a policy that is compliant with 45 CFR Part 94, must complete OHSU’s Col disclosure. First, register in the Big Brain system (<https://bigbrain.ohsu.edu>); then, the Col disclosure is accessed as “Conflict of Interest” in the Course Catalog.