

## FREQUENTLY ASKED QUESTIONS: PHS REQUIREMENT TO DISCLOSE SPONSORED/REIMBURSED TRAVEL

### **What is Sponsored Travel?**

Sponsored Travel is any travel expense that has been paid directly for you by a third party or for which you have been reimbursed directly by a third party. This includes the travel expenses of your spouse and dependents if the travel is in conjunction with your professional activities.

### **Why must I disclose Sponsored Travel?**

USA applies this requirement only to Investigators working on a PHS funded project.

**Reporting of reimbursed or sponsored travel related to a PHS-funded Investigator's institutional responsibilities is required under [42 CFR Part 50 Subpart F](#).** 42 CFR Part 50 Subpart F promotes objectivity in research by establishing standards that provide a reasonable expectation that the design, conduct, and reporting of research funded under Public Health Service (PHS) grants or cooperative agreements will be free from bias resulting from Investigator financial conflicts of interest. The regulations require all PHS funded investigators to "disclose the occurrence of any reimbursed or sponsored travel (i.e., that which is paid on behalf of the Investigator and not reimbursed to the Investigator so that the exact monetary value may not be readily available), related to their institutional responsibilities..." 42 CFR §50.603.

### **Who must disclose Sponsored Travel?**

The principal investigator or key personnel on any project funded by the Public Health Service, as well as any principal investigator or member of the key personnel of any project that is a subaward or subcontract under another entity's PHS-funded project must report Sponsored Travel. Members of the research team who are key personnel should report if the individuals have the authority to make independent decisions about the direction of the research and the subsequent conclusions about the results. This does not include administrative personnel or individuals who perform routine, pre-defined, or incidental tasks related to the project.

### **How do I disclose Sponsored Travel?**

The process of reporting reimbursed or sponsored travel will take place as a transactional disclosure via completion of travel request submitted through Concur electronic management system.

### **Institutional Official review and approval:**

The Office of Research Compliance and Assurance receives an automated notification via Concur to review the request if the employee's travel is sponsored or reimbursed by a third party and the traveler is PHS-funded.

The regulation does not specify the process to be used by Institutions for review of Investigator sponsored/reimbursed travel disclosures. The National Institutes of Health (NIH), in particular, main interest in requiring travel information to be collected is to ensure institutions are aware of their faculty

travel and any excessive situations that raise concerns. The required disclosure elements include purpose of trip, sponsor/organizer, destination and duration. The department chair/supervisor will consider in their review/signature any financial conflict of interest (applicable only for investigator's funded with PHS dollars), and only if travel is reimbursed/sponsored by sources other than named below. Any potential financial conflict of interest that may bias PHS research activities should be elevated to the Dean and reported to the Office of Research Compliance and Assurance.

### **What Sponsored Travel should be disclosed?**

PHS funded Investigators should disclose any reimbursed or sponsored travel related to their institutional responsibilities. Examples include:

- Travel that is reimbursed or paid directly by any for-profit company or non-profit organization, other than another university as described below, for speaking or participation in meetings, conferences, proceedings, etc.
- Travel that is reimbursed or paid directly for services as an expert witness
- Travel that is reimbursed or paid directly by any entity in which you have a personal financial interest such as a start-up company, a licensee of intellectual property that you invented or created, consulting company, or other business
- Travel that is reimbursed or paid directly by any person or entity for whom you are serving as a consultant except other universities and government agencies as described below
- Travel that is reimbursed or paid directly by the sponsor of your research except other universities and government agencies as described below
- Travel that is reimbursed or paid directly by any vendor, prime contractor, or any sponsor of a subaward or subcontract except other universities and government agencies as described below

### **Is there Sponsored Travel that I do not have to disclose?**

Sponsored Travel related to scholarly activities such as serving as a grant reviewer for a government agency, or serving on a government task force or panel does not need to be reported. The Sponsored Travel that **DOES NOT** need to be reported includes the following items.

- Travel that is reimbursed or paid directly by a federal, state, or local government agency
- Travel that is reimbursed or paid directly by an institution of higher education
- Travel that is reimbursed or paid directly by an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education
- Travel reimbursed or paid directly for service on National Academies panels, committees, roundtables, taskforces, or membership meetings
- Travel reimbursed or paid directly by non-profit organizations in which USA is a member institution and for which you are serving as a member of its governing board, a panel or a task force where such service has been approved by the Institute