

Guidance for PHS Travel Reporting Requirements

PHS-funded Investigators/Support Personnel are required to disclose (**\$5,000 threshold, aggregate per entity**) reimbursed/sponsored travel related to their institutional (professional) responsibilities.

This does **NOT** include travel that is reimbursed by:

- Federal, state, local government agency
- Institution of higher education
- Academic teaching hospital
- Medical center; or
- Research institute affiliated with an institution of higher education

The disclosure of reimbursed or sponsored travel **MUST** include the:

- Purpose of the trip
- Identity of the sponsor/organizer
- Destination of the travel
- Duration of the travel and
- Monetary value of the travel

Helpful Hints:

- The travel reporting requirements apply only to PHS-funded Investigators/Support Personnel.
- If your travel is sponsored or reimbursed **in excess of \$5,000 (aggregate per entity)**, it must be disclosed.
- If you are reimbursed directly, you must disclose it. If the reimbursement goes to Creighton University and **NOT** directly to you, you are not required to disclose it.
- You may report any anticipated travel on your initial or annual disclosure, and estimate the monetary amount(s). If you report anticipated travel on the initial or annual disclosure, you do **NOT** have to report it again.
- If your reimbursed or sponsored travel was not reported on your initial or annual disclosure, you must submit a new disclosure form within 30 days after such travel has taken place.
- If, after reviewing the disclosure, the Conflict of Interest Review Committee determines that the reimbursed or sponsored travel constitutes a financial conflict of interest, that information will be made available to the public via written request.

Example:

You are a research coordinator who is listed on a PHS grant and you attend an investigator's meeting for a pharmaceutical company. If your travel expenses are reimbursed directly to you, you must report it on your disclosure form.

NIH Frequently Asked Questions

1. **Do I need to disclose the occurrence of reimbursed or sponsored travel related to my institutional (professional) responsibilities?**

Yes. The regulation requires Investigators/Support Personnel to disclose reimbursed travel or sponsored travel in excess of \$5,000 (aggregate per entity) (i.e., that which is paid on behalf of the Investigator/Support Personnel and not reimbursed to the Investigator/Support Personnel so that the exact monetary value may not be readily available), related to the Investigator's/Support Personnel's institutional (professional) responsibilities. However, the disclosure requirement does not apply to travel that is reimbursed or sponsored by the entities listed above.

2. **Does an Investigator/Support Personnel need to disclose all reimbursed or sponsored travel in excess of \$5,000 (aggregate per entity), if it is reimbursed or sponsored by sources other than those excluded from disclosure (i.e., Federal, state, or local government agency, an institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education)?**

Yes. The regulation does not specify the process to be used by institutions for review of Investigator/Support Personnel travel disclosures; however, the institution is responsible for determining whether such travel constitutes a financial conflict of interest with PHS-funded research. Travel to scientific meetings and to present research to colleagues and other interested parties is an integral part of the scientific research enterprise and affords many important opportunities for forging relationships and collaborations among researchers. The provisions in the revised regulations are not intended to discourage this type of travel, but require the disclosure of the occurrence of reimbursed or sponsored travel **in excess of \$5,000 (aggregate per entity)** related to the Investigator's/Support Personnel's institutional (professional) responsibilities, provided the travel is not sponsored or reimbursed by those identified sources excluded in the final rule.