# 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 (y)-4.5 (a)0 (p)2.sy a.3 ((y)-4.5 p) dependents if the travel is in conjunction with your professional activities.

# Why must I disclose Sponsored Travel?

USA applies this requirement <u>only</u> 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** <u>42 CFR Part 50 Subpart F</u>. 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 befree from bias resulting from Investigator financial conflicts of interest. The regulations require <u>all</u> 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