

## SPONSORED TRAVEL REPORTING

As of August 24, 2012, new federal regulations relating to financial conflict of interest went into effect for individuals who receive sponsored research support through the Public Health Service (PHS) of the U.S. Department of Health and Human Services (e.g., NIH, CDC, and FDA). These new rules require active steps on your part.

Any individual who receives or is paid on a PHS-funded research grant is now required to disclose all reimbursed or sponsored travel (*i.e.*, paid on behalf of the individual) taken on or after August 24, 2012. Travel will need to be disclosed to Inova within 30 days of the travel.

Individuals participating in research sponsored by the PHS are required to disclose certain information about all sponsored or reimbursed travel if the investigator and the travel both meet all three criteria listed below:

- The faculty or staff member is paid for research that is sponsored/funded by the PHS (e.g., any NIH funding greater than 0% effort);
- The travel is reimbursed or sponsored by some external entity (see exceptions on the next page); and
- The sponsored travel is related to your institutional responsibilities to Inova (e.g., as a physician scientist, you're being sponsored to speak about your science, as opposed to being sponsored to speak on an unrelated topic, like a hobby).

You do **not** have to report travel if it is reimbursed or sponsored by any of the following:

- An institution of higher education;
- A federal, state or local government agency;
- An academic teaching hospital; or
- A research institute that is affiliated with an institution of higher education.

Otherwise, travel supported by all other sponsors **must** be reported, including foundations, professional associations, societies, professional boards, corporations, etc.

If the travel qualifies for reporting (*i.e.*, is sponsored and is related to your professional responsibilities), then you must report:

- The identity of the sponsor/organizer (if the sponsor is a company, but it is working through a marketing company, report the primary sponsor of the trip rather than the intermediary);
- The purpose of the trip (e.g., advisory board service, consulting, meetings, etc.);
- The destination for the trip; and
- The duration of the travel, specifically, the date you left and the date you returned.

Examples of Nature of Arrangement	Must Disclose?
Travel paid for by industry (directly paid to the individual, not through Inova)	Yes
Travel paid for by a non-profit foundation	Yes
Travel paid for by a professional society (e.g. American Cancer Society, European Society for Pediatric Infectious Diseases)	Yes
Travel for work related to a pharmaceutical company-sponsored contract through Inova (for example, Lung Transplant related monitoring or presenting data for a Lung Transplant coordinated project)	No (since it is paid through Inova, it becomes academic work)
Travel to an academic medical center paid for by that center	No
Travel to a healthcare facility paid for by Inova to give a lecture	No
Travel to a board meeting in another state paid for by the American Heart Association	Yes
Travel to a research meeting in Chicago paid for with Inova department funds	No
Travel to an advisory board meeting for a nonprofit organization for which you are reimbursed by the nonprofit organization	Yes
Travel paid for by the American Cancer Society to an academic meeting to present NIH grant-funded research	Yes
Travel to another healthcare facility to give a seminar where Inova reimburses you, but the other healthcare facility received funding for the seminar from a pharmaceutical company	No, if the reimbursement came from Inova
Travel to a research meeting to present where the ticket is paid using a Inova account	No
Travel that combines a trip to an advisory board paid for by the company and a family vacation for which I am paying for myself	It is not uncommon to combine a business trip with a personal vacation. It is fine to do so as long as the vacation part of the trip is paid for by personal funds and not by the company that is paying for the business trip When disclosing the duration, you will only need to disclose the duration of the business portion of the trip.



## SPONSORED TRAVEL REPORTING FORM

Please complete this form and fax it to **703.764.5560** or email to: [gmo@inova.org](mailto:gmo@inova.org).

Department/Operating Unit: \_\_\_\_\_

Inova PI Name: \_\_\_\_\_

Title of Inova PHS Project: \_\_\_\_\_

Section I: Personal Information – Please print/type	
Name: _____	Mail Address: _____
Institution: _____	Telephone Number: _____
Site Name: _____	Email Address: _____

Destination: \_\_\_\_\_

Purpose: \_\_\_\_\_

Sponsor: \_\_\_\_\_

Start Date: \_\_\_\_\_

End Date: \_\_\_\_\_

Travel expense equal to or greater than \$5,000:  Yes  No

International:  Yes  No

Please keep this form and make a copy for each trip you report. Send to GMO within 30 days of the travel activity.