

To: Academic Conflict of Interest Coordinators

Subject: Travel Disclosure Options under University of California Disclosure of Financial Interests & Management of Conflicts of Interest, Public Health Service Research Awards Policy

PHS Regulations, effective August 24, 2012, require disclosure of all reimbursed or sponsored travel related to the Investigator's Institutional Responsibilities, but did not impose a general requirement to apply a *de minimis* threshold to such travel disclosures (see [42 CFR 50.603\(3\)](#)).

On October 18, 2012, the NIH published notice [NOT-OD-13-004](#), a policy clarification regarding the above regulatory requirement. This policy clarification stated that institutions had discretion "...to impose the \$5,000 threshold to reimbursed or sponsored travel disclosure in their institutional policies which specify the disclosure details. For example, consistent with the requirement for other types of financial interests within the regulatory definition of SFI, Institutions could apply the *de minimis* threshold when aggregated per entity."

Section V. of the [University of California Policy for Disclosure of Financial Interests & Management of Conflicts of Interest, Public Health Service \(PHS\) Research Awards](#) provides that "(c)ampuses and the Lawrence Berkeley National Laboratory shall develop procedures to implement this systemwide policy."

The relevant PHS regulations, the policy clarification from NIH, and the University's Policy may be read together to allow individual UC campuses the discretion to develop and implement local procedures that either require disclosure of all reimbursed or sponsored travel related to PHS-funded Investigators' Institutional Responsibilities, or that impose a \$5,000 threshold to reimbursed or sponsored travel disclosure in their local procedures that specify disclosure details.

With either option, and as noted in the above-reference policy clarification, disclosure of reimbursed or sponsored travel remains subject to the exclusions described in [42 CFR 50.603\(3\)](#). Investigators must disclose their Significant Financial Interests (SFIs), including reimbursed or sponsored travel over the previous twelve-month period (initial disclosure), no later than at the time of application. This is the same disclosure requirement that applies to all other SFIs.

The initial disclosure of SFIs over the previous twelve-month period provides baseline information that allows Institutions to take into account whether Investigators have an ongoing financial relationship with an entity providing a payment or reimbursement or whether the payment or reimbursement was limited in duration. Once Investigators have made their initial disclosure, they are required to update their disclosures within 30 days of discovering or acquiring a new SFI and at least annually during the period of award.

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A handwritten signature in black ink that reads "Wendy D Streit". The signature is written in a cursive style with a large, looped 'W' and 'S'.

Wendy D. Streit
Executive Director
Research Policy Analysis and Coordination