

MISSISSIPPI STATE UNIVERSITY CONFLICT OF INTEREST REVIEW COMMITTEE	Sponsored or Reimbursed Travel (01-03) <i>Approved 04-10-2013</i>
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I. Introduction

MSU's policy on the disclosure of significant financial interests ("SFI") is based on federal regulations which require disclosure of sponsored travel (travel that is paid for or on behalf of an Investigator and not reimbursed to the Investigator directly) or reimbursed travel that is related to Investigator institutional responsibilities and is paid by an Entity other than MSU. The \$5,000 threshold applied elsewhere in the federal regulations does not apply to sponsored or reimbursed travel, thus, any amount of sponsored or reimbursed travel that is related to Investigator institutional responsibilities paid by an outside entity must be disclosed as a SFI.¹ While any amount of sponsored or reimbursed travel must be disclosed to the University by its Investigators, it is clear from regulatory guidance and comments that institutions have great flexibility in the review of those disclosures and determinations of whether the sponsored or reimbursed travel could "directly and significantly affect" the design, conduct or reporting of University research. Based upon guidance provided by the National Institutes of Health, the Conflict of Interest Review Committee has determined that there are certain types and purposes of sponsored or reimbursed travel that could not "directly and significantly" affect University research and thus do not require review for conflicts of interest. This determination is based upon the nature of the Entity paying for the sponsored or reimbursed travel or the purpose of the travel (e.g. often times the travel paid for by another Entity is for activities that advance the discloser's research and teaching and is considered vital to the discloser's position at the University) and the University's determination that given the academic or Non-profit nature of such Entities or such travel there is little to no risk that the travel could directly and significantly impact related University research.

II. Definitions

Reimbursed Travel – 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.

III. Procedures

The Conflict of Interest Review Committee grants the authority to the COI Manager to administratively review and process such disclosures:

1. If, after reviewing the disclosure and all relevant information, the COI Manager determines that the disclosed sponsored or reimbursed travel is paid by an Entity to allow the discloser to travel to an academic conference, e.g. not a conference hosted by a for-profit Entity in order to advance that Entity's commercial product or services but rather the conference is intended to present new or relevant research or information nationally or regionally in the academic area of study of the discloser, then no further conflict of interest review of the sponsored or reimbursed travel shall be required and the decision entered shall be a determination of no conflict of interest.
2. If, after reviewing the disclosure and all relevant information, the COI Manager determines that the disclosed sponsored or reimbursed travel is paid by any Entity to allow the discloser to attend a professional society meeting, then no further conflict of interest review of the sponsored or

reimbursed travel shall be required and the decision entered shall be a determination of no conflict of interest.

3. If, after reviewing the disclosure and all relevant information, the COI Manager determines that the disclosed sponsored or reimbursed travel is paid by a foreign institution of higher education, a foreign academic teaching hospital, a foreign medical center, a foreign research institution that is affiliated with an institute of higher education, or a foreign government to allow the discloser to collaborate on research, professional practice or teaching with the host institution or host researchers, then no further conflict of interest review of the sponsored or reimbursed travel shall be required and the decision entered shall be a determination of no conflict of interest.
4. If, after reviewing the disclosure and all relevant information, the COI Manager determines that the disclosed sponsored or reimbursed travel is paid by a for-profit Entity or Industry- controlled Non-Profit Entity and not for any of the purposes outlined above (e.g., academic conferences and collaborations, local, or professional society meetings) and the aggregated total of travel paid by a single Entity is equal to or less than \$5,000 in the previous 12 month period, then no further conflict of interest review of the sponsored or reimbursed travel shall be required and the decision entered shall be a determination of no conflict of interest.
5. If, after reviewing the disclosure and all relevant information, the COI Manager determines that the disclosed sponsored or reimbursed travel does not meet any of the above noted purposes or exceptions, then the travel shall be reviewed by the Conflict of Interest Review Committee for potential conflicts of interest with related research. Or, if the COI Manager determines it does meet one of the above noted purposes or exceptions, however, under the facts disclosed and any other relevant circumstances involved, the COI Manager determines that disclosed travel has the potential to directly and significantly affect the related research, then the disclosure shall be reviewed by the Conflict of Interest Review Committee for potential conflicts of interest with related research.

¹ There are exceptions to the disclosure requirement that are contained in MSU OP 70.09 and follow the federal regulations, e.g. compensation, and sponsored or reimbursed travel paid by a U.S. institution of higher education or a U.S. government agency does not need to be disclosed as it is excluded from the definition of an SFI.

Conflict of Interest Review Committee Chair

Date