

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. While sponsored or reimbursed travel that exceeds \$5,000 must be disclosed, the University has great flexibility in the review of those disclosures. 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

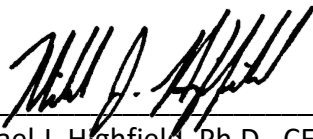
Reimbursed Travel – that which is paid on behalf of the investigator and not reimbursed to the investigator so that the exact monetary value may not be readily available.

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 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.
4. 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.



Michael J. Highfield, Ph.D., CFA, CTP
Conflict of Interest Review Committee Chair

August 17, 2021

Date