

- 1. What does third party travel mean?
- 2. What types of entities supporting third party paid travel are included/excluded from the disclosure requirement?
- 3. What is the dollar threshold for reporting third party paid travel?
- 4. How do I complete and submit this travel form?
- 5. When am I required to disclose third party paid travel?

Third Party Paid Travel Report for PHS and DOE Investigators								YALE	
Investigator Name:				Investigator NetID:		Department:			
Entity:				For Profit Entity?				Yes No	
Traveler(s)		Purpose of Travel		For which Yale activity was this travel	Brief Trip Description	Destination (city, state, province, country)	Last Day of Trip	Duration (In Days)	Approx. Value
Me Me, Spouse/Dependent Child		Conference Review Panel Consulting Speaker Lecturer Speaker's Bureau Expert Witness Professional Society Meeting Other:		Administrative Clinical Instruction Public Service Research Other:					
Me Me, Spouse/Dependent Child		Conference Review Panel Consulting Speaker Lecturer Speaker's Bureau Expert Witness Professional Society Meeting Other:		Administrative Clinical Instruction Public Service Research Other:					
Me Me, Spouse/Dependent Child		Conference Review Panel Consulting Speaker Lecturer Speaker's Bureau Expert Witness Professional Society Meeting Other:		Administrative Clinical Instruction Public Service Research Other:					
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						Total:	
Comments:							

Signature

Date

Signature of Traveler (Travelers submitting this completed form via their own Yale email address do not need to sign and date this form.)

Form Submission Instructions:
This form can be filled in electronically. Send the completed form to the Conflict of Interest Office via email or Fax.

- Email:**
- If you attach your completed form to an email using your own Yale email address and send it to the Conflict of Interest Office (coitravel@yale.edu), you DO NOT NEED TO SIGN AND DATE THE FORM.
 - If you (or someone else on your behalf) attach your completed form to an email using a non-Yale email address or someone else's Yale email address and send it to the Conflict of Interest Office (coitravel@yale.edu), you must print your name, sign, and date the form before it can be attached to the email.

- Fax:**
- A signed and dated form can be Faxed to the COI Office at: **(203) 785-4255**

For COI Use Only

Date Received:

1. What does third party travel mean?

Third party travel means:

- A third party directly pays, in whole or in part, for travel that is related to the investigator’s institutional responsibilities for the investigator and/or the investigator’s spouse and/or dependent children.
- An investigator (and/or spouse and/or dependent children) pays for travel that is related to the investigator’s institutional responsibilities, and a third party reimburses him/her for part or all of that travel.
- Yale pays in whole or in part for travel and the third party reimburses Yale (directly; not through a sponsored award or a broader contract to Yale).

2. What types of entities supporting third party paid travel are included/excluded from the disclosure requirement?

Include travel paid by:

- For profit entities.
- Most non profit entities, including external professional organizations and societies.
- Academic journals and publishing companies.
- Foreign Institutions of higher education.
- Any government of another country.

Exclude travel paid by:

- Yale or funded by a sponsored award to Yale.
- U.S. Federal, state or local government agencies.
- U.S. Institutions of higher education.
- U.S. research institutes that are affiliated with U.S. Institutions of higher education.
- U.S. academic teaching hospitals that are affiliated with U.S. Institutions of higher education.
- U.S. medical centers that are affiliated with U.S. Institutions of higher education.

Note: Yale affiliated organizations include for example, YNHH, CMHC, The John B. Pierce Laboratory, HHMI, VACHS.

3. What is the dollar threshold for reporting third party paid travel?

Travel from a single reportable entity with an aggregate amount >\$5,000 must be disclosed. The >\$5,000 threshold either may result from a single trip or may accumulate from multiple trips paid for by the same entity.

Once the aggregate from a single reportable entity exceeds \$5,000, the investigator must submit a travel disclosure within 30 days of returning from the trip that made the total exceed the threshold. If the \$5,000 threshold was exceeded because of multiple trips for a single entity, each trip should be listed individually on that disclosure.

After making an initial travel disclosure that exceeded \$5,000, additional trips for the same entity do not need to be reported until the end of the fiscal year (June 30). At that time, all of the additional trips (regardless of amount) for that entity will need to be reported (the COI Office will send you a reminder).

4. How do I complete and submit this travel form?

Only a single entity can be reported on the travel form. Therefore, you will need to complete multiple forms if there are multiple entities that provided more than \$5,000 in reportable third party paid travel.

The >\$5,000 threshold may occur as the result of one trip or multiple trips. For a single trip, complete the form within 30 days of your return from the trip and submit it to the COI Office as instructed at the bottom of the form.

If the >\$5,000 threshold is exceeded because of multiple trips for a single entity, submit the completed form within 30 days of returning from the last trip, **but list every trip on the form.**

Remember: If an entity continues to provide travel after your initial disclosure for that entity, you will need to disclose all of the additional trips in your June 30 travel disclosure (the COI Office will send you a reminder).

5. When am I required to disclose third party paid travel?

If you are a PHS or DOE investigator who has been submitting Yale’s PHS Disclosure Form:

- Each fiscal year, starting July 1 you will begin tracking third party paid travel for that given year. You will need to report third party paid travel when the amount for any single entity exceeds \$5,000 as described above in Question 4. Remember, reportable travel must be disclosed within 30 days of your return from the trip.
- After making this initial travel disclosure that exceeded \$5,000, additional trips for the same entity do not need to be reported until the end of the fiscal year (June 30). At that time, all of the additional trips (regardless of amount) for that entity must be disclosed (the COI Office will send you a reminder).

If you are a PHS or DOE investigator who is completing a Yale PHS COI Disclosure Form for the first time:

- At the time of your initial PHS disclosure to Yale, you must disclose any reportable third party paid travel for the 12 months preceding your disclosure if the aggregate amount during that time frame exceeded \$5,000 from a single entity (as a result of one trip or multiple trips).
Example: If May 20, 2022 is the first time you submit a PHS disclosure to Yale, you will need to disclose any reportable travel that occurred between May 20, 2021 and May 20, 2022.
 - After making this initial travel disclosure, additional trips for the same entity do not need to be disclosed until the end of the current fiscal year (June 30). At that time, all of the additional trips for that entity must be disclosed (the COI Office will send you a reminder).