COI Travel Disclosure Guidelines

This guideline serves to advise WCM faculty, staff, students, and trainees on disclosing travel reimbursed or paid by an external entity.

Various regulatory and oversight groups require institutions to monitor external funding of travel for their students and employees involved in research and clinical care. In addition, travel undertaken by WCM employees but paid for by industry are reported by industry to the Medicare Open Payments Database. Such information is also relevant to the WCM conflict of interest management disclosure process.

Travel disclosures can be made through your conflicts survey in Weill Research Gateway. All paid and reimbursed travel must be disclosed within 30 days of completing travel.

Disclosure is required for any payment or reimbursement from:

US Entity
- A “for-profit” entity.
- A US academic entity, “non-profit” entity, governmental agency, or professional society, when the amount in aggregate exceeds $5,000 per year. For example, you must only report such funding if:
  - The trip was more than $5,000,
  - Multiple trips for that entity in aggregate exceed $5,000,
  - You receive more than $5,000 for services from that entity, or
  - A combination of trips and services in aggregate from a single entity exceeds $5,000.

Non-US Entity
- All travel funded by a non-US entity must be disclosed.

No disclosure is required for:
- Travel reimbursed or paid by Cornell University, WCM, or WCM-Qatar, and their affiliates.
- Travel reimbursed by Qatar Foundation.

Special precautions for travel to China, Russia, or Venezuela: U.S. federal regulations require that all persons who are planning personal or business travel to China, Russia, or Venezuela need to complete an Electronic Export Information (EEI) filing with U.S. Customs and Border Protection prior to travelling. Instructions for completing the EEI can be found here. For more information, please visit WCM’s Export Controls website: https://research.weill.cornell.edu/export-controls.

If you need further explanation about the conflicts survey and/or travel disclosures, please contact the Conflict of Interest Office at conflicts@med.cornell.edu. You may also visit WCM’s Conflict of Interest website: https://research.weill.cornell.edu/conflict-interest-office.