

We have received questions regarding **disclosure of reimbursed or sponsored travel**. Key takeaways for travelers are below.

1. For travel reimbursed or sponsored by UT Southwestern, such as for conference hotel expenses, disclosure is not required. Travel paid through grant or contract funds is considered reimbursed/sponsored by UT Southwestern because the funds come from an institutional agreement and not a personal financial relationship, and disclosure is not required.
2. Disclosure within 30 days of reimbursed or sponsored travel directly from an outside entity to or on behalf of a Covered Individual is required because it is a type of *personal compensation*.
3. Disclosure of each occurrence of reimbursed or sponsored travel is required because state and federal conflict of interest regulations require the institution to track *cumulative personal compensation*. That is, any one trip may not create a conflict of interest; however, multiple trips combined with other types of compensation from the same outside entity could. Conflict of interest regulations also require ongoing, ***timely disclosure*** of reimbursed or sponsored travel (defined as within 30 days; see additional discussion below).
4. Conflict of interest regulations require the institution to evaluate compensation, including reimbursed or sponsored travel, within the prior 12-month period from the time of evaluation (which is on a rolling basis that does not align with a calendar year). Since the [COI-Info Portal](#) is not currently optimally configured to capture financial interests this way, Covered Individuals may do the following:
 - a. First, if you have reimbursed or sponsored travel to disclose and have not already done so, add the entity, or click into an existing entity, and select “Travel required for any activity/interest” in Question 6.
 - b. For 2025, make sure Question 6j.7.1 is correct by selecting the total amount of reimbursed or sponsored travel for the year. That question is labeled as “Please indicate the value of the reimbursed or sponsored travel from the outside entity for the 2025 calendar year.” If you have a 2025 total amount to disclose and that question is not displaying for you, select “Yes” for Question 6j.7, which is “Did you participate in this travel in 2025?” No additional information required.
 - c. For 2026 travel to-date, the best place in the COI-Info Portal to make a travel update for each occurrence is in Question 6j.6, “Please provide a brief description of the reason for travel in the text box below.” Include the date(s), location(s), total amount, and purpose of reimbursed or sponsored travel for that trip. When making your next update, do not delete prior 2026 disclosures. Simply add the next one. Here is an example: “7/15-17/2026; Detroit, MI; \$3,250; Scientific Advisory Board meeting.” You may need to update other travel-related questions as well. For example, if the cumulative value of reimbursed or sponsored travel would change the

total dollar amount range in Question 6j.5, e.g., from \$1-\$4,999 to \$5,000-\$9,999, then you should update that answer as well.

- d. Please see this [guide](#) on how to update the disclosure form (called the “Statement of Financial Interests”) in the COI-Info Portal.
5. An activity that includes travel may be considered pre-approved in [EMP-158](#) (Outside Activities and Conflict of Commitment). However, any personal compensation from a pre-approved activity, including reimbursed or sponsored travel, still requires disclosure per [ETH-104](#) (Conflict of Interest).
6. According to ETH-104, all reimbursed or sponsored travel provided by any outside entity must be disclosed, which means any outside entity that is not UT Southwestern. For example, if a nonprofit entity reimburses for a hotel stay, disclosure of that reimbursement is required.
7. Note that disclosure of reimbursed or sponsored travel is separate from and in addition to other institutional requirements regarding travel (e.g., export controls, international travel review and monitoring program). Travelers are required to follow all applicable policies and requirements.

As Dr. Podolsky announced in his reflection email on May 27, 2026, there is a Commission conducting a comprehensive review of our conflict of interest policies. While we anticipate major changes to policies emerging from the Commission, the most recent policy revisions were made to more clearly align with applicable regulations and current guidance. We will update the community again and provide comprehensive training once the Commission has completed its work and those additional policy updates have been implemented.

UT Southwestern has historically had a major focus on **annual disclosure** of financial interests. Disclosure of financial interests *at least annually* is essential; however, as noted above, both state and federal conflict of interest regulations also require **timely disclosure**, i.e., within 30 days of discovering or acquiring a financial interest (see ETH-104, p.2, #1(c)). For reimbursed travel, the 30-day period begins once you receive the reimbursement. For sponsored travel, the 30-day period begins when the sponsor informs you of the value of the sponsored travel. This applies to all financial interests, including reimbursed or sponsored travel. Covered Individuals may not wait until annual disclosure time to disclose newly discovered or acquired financial interests.

We acknowledge that reimbursed or sponsored travel is a confusing topic, and that the COI-Info Portal is not ideally configured to easily facilitate timely disclosures. We also acknowledge that the relationship between Outside Activities, such as travel, and Financial Interests is not maximally clear and is covered within different policies. Future policy and COI-Info Portal changes will help significantly. We are also considering implementing an alternative disclosure form for travel in the interim. We appreciate the community’s patience as we continue this work.