FACULTY COUNCIL MEETING

**3:00 p.m., Tuesday, February 11, 2020**

# Council Room, 412 Student Union

**AGENDA:**

1. Roll Call

2. Approval of the January 14, 2020 Minutes

3. Approval of Agenda

4. Special Reports:

A. Darlene Hightower – Chief Information Officers IT – Multi-Factor Authentication

5. President Hargis – Remarks and Comments

6. Report of Status of Faculty Council Recommendations:

President Hargis, Provost Sandefur and/or Vice Presidents

7. Reports of Liaison Representatives –

1. SGA – Ashley Schultz

SGA will be lobbying Tuesday, February 11th for Higher Education

1. Emeriti Association – Barbara Miller

Dr. Randy Seitsinger, Dean for Academic Affairs in CEAT, was guest speaker at the February Emeriti Dinner. He discussed the new Engineering Labs and how they help undergraduates become exposed to various engineering/architecture/technology methods and materials.  These labs are state-of-the-art, and are an example for other universities which are now following OSU’s lead.

Our speaker for March will be Clint Williams from the McKnight center, who will speak about their involvement in community engagement and hopefully give a heads up on next year’s McKnight Center performers.

The Emeriti are working with the Committee on Retirement and Fringe Benefits to present a panel on how to prepare for retirement.  Topics such as how long to delay retirement, taxes on retirement income medial insurance, etc.

1. Wellness Center – Kim Beard



1. Graduate Council – Rebecca Sheehan

*Academic Program Committee.* A variety of degree modifications were approved.

*Graduate Commencement December 2019.* Two hundred and sixty-six graduate students, receiving certificate, master’s, and doctoral degrees, attended the ceremony.

*Slate.* Slate, the online graduate application system and more (e.g. recruitment, communication flows, and hopefully will facilitate tuition waiver processing in the future), is fully functioning.

*Graduate Faculty Training/Development Working Group*. The research groups plans to send out a survey to OSU graduate faculty after spring break 2020. This survey is part of a needs assessment of the graduate faculty in serving graduate students in order to develop an appropriate professional development program for incoming and existing graduate faculty.

*Role of Non-OSU Faculty Serving on Graduate Committees.* Currently, non-OSU faculty members are given a formal graduate faculty status, which is not necessary given they mainly only serve on specific committees. Additionally, the Graduate Dean at OSU has no authority over those individuals. The Graduate College is seeking input from Graduate Faculty and Programs about this topic, and this will be a topic for discussion at the Spring Subject Group meetings.

*Graduate Student Orientation*. Starting this spring (2020), new students on all three campuses and online received an invitation to enroll in a graduate student orientation “course” through Canvas. There are a series of 8 ~3 minute video modules (Introduction, Module 1: Welcome to OSU, Module 2: Preparing for Graduate School, Module 3: Preparing for Your Arrival, Module 4: Your First Semester, Module 5: Nuts & Bolts of Being a Graduate Student, Module 6: Finding Support When You Need It, Module 7: Taking Care of You, Module 8: Useful Resources for Graduate Students), taking about 45 minutes to complete. Programs may build their own orientation modules which can then be linked to the Graduate College’s course.

*GTA/GRA Vacation policy*. The Graduate College, in conjunction with Graduate Council, will be developing guidance on a GTA/GRA vacation policy for programs looking for assistance with this issue. The Graduate College is seeking input from Graduate Faculty and Programs, and this will be a topic for discussion at the Spring Subject Group meetings.

*Spring 2020 General Graduate Faculty Meeting and (most) Subject Group Meetings*. Wednesday, March 25 1:30 to 3:00 p.m. Location: 450 EN (Engineering North).

1. Women’s Faculty Council – Awilda Rodriguez Carrion

Dr. Janice Hermann presentation for February has been rescheduled. Please check our website for the latest news and dates at <https://womensfacultycouncil.okstate.edu>.

The Women’s Faculty Council is actively soliciting reviewers for the Scholarships & Research Awards Program. Interested parties, please contact Sarah Milligan at [sarah.milligan@okstate.edu](mailto:sarah.milligan@okstate.edu).

1. SAC – Tashia Cheves

* Current SAC Recommendations
* Policies in Review from HR
* SAC Elections Opening
* Staff Scholarships

8. Reports of Standing Committees:

a. Academic Standards and Policies: Eric Rebek – No Report

b. Athletics: Justin Talley – No Report

c. Budget: Jam Khojasteh – No Report

d. Campus Facilities, Safety, and Security: Karen Neurohr – No Report

e. Diversity: Justin Moss – No Report

f. Faculty: Matt Lovern – No Report

g. Long-Range Planning and Information Technology: Christopher Crick – No Report

h. Research: Dianne McFarlane – Update

Recommendation: Conflict of Interest\*

i. Retirement & Fringe Benefits: Griffin Pivateau – No Report

j. Student Affairs and Learning Resources: Toby Nelson – No Report

9. Old Business –

10. New Business –

k. Rules and Procedures: Pamela Lovern – Update

11. Adjournment

*Refreshments will be served at 2:45 p.m.*

**Amended by Passed Failed**

**Recommendation No.** 20/02/01 1.\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_

**Moved by:**  Research Committee  2.\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_

**Seconded by:**  3.\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_

**Passed**         **Tabled**         **Failed**  4.\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_

**Title:**       **CONFLICT OF INTEREST IN SPONSORED PROGRAMS 4-0130**

**The Faculty Council Recommends to President Hargis that:**

Accept the revisions in the Conflict of Interest in Sponsored Research Policy 4-0130 as presented.

**Rationale:**

This is a major revision of the current COI policy. The policy will reduce the number of individuals subject to the policy; moves the reporting, determination of conflict of interest, and oversight of management or elimination of a conflict of interest from the colleges to a central committee. In addition, the administrative procedures have been moved from the policy into a separate guidancedocument (not included).

**Justification:** The original policy was written more than 20 years ago and the two subsequent revisions (2006 and 2012) made the policy cumbersome and difficult to monitor for compliance. Further, the original policy resulted in the requirement for reporting by individuals not covered in the federal regulations related to sponsored research which established the need for the policy. In addition, little administrative guidance was provided to the units responsible for carrying out major components of the previous policy, resulting in inconsistent application of the policy across the university. Providing administrative guidance as a separate document will allow the university to modify and update guidance more quickly in the future as the need arises. Finally, the title is changed to reflect the focus on sponsored research contexts in which conflicts of interest are required to be disclosed and managed as per federal regulations.

**Oklahoma State University Policy and Procedures**

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| **CONFLICT OF INTEREST IN SPONSORED PROGRAMS** | **4-0130**  **RESEARCH**  **Date 2020** |

**INTRODUCTION**

* 1. As an institution dedicated to excellence in education, research and extension/outreach, Oklahoma State University (OSU) places a high value on research integrity and academic freedom. Objectivity in the conduct of research, the freedom to disseminate ideas through publication of research results, the protection of the rights and interests of research participants, maintenance of public trust, and the ability to ensure that our responsibility to our students and trainees is not compromised are critical to these institutional values. Relationships with industry and other outside entities, while important to the support and advancement of research, can present special challenges in protecting these institutional values.
  2. It is the policy of OSU that no proposed, awarded, or ongoing research project at the university shall be biased by a significant financial interest of any investigator responsible for the design, conduct or reporting of the research. The purpose of this policy is to assure objectivity in research.
  3. All OSU investigators who apply for or receive funding from any sponsor for a research project will comply with the requirements of this policy and the OSU conflict of interest procedures for PHS funded research or non-PHS funded research, as applicable.
  4. It is the intent of this policy to provide assurance to investigators, OSU, sponsors of institutional research, and the public, that research activities at OSU will be conducted in a manner consistent with institutional and public values.

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* 1. This policy applies to all OSU personnel, including, but not limited to, administrators, faculty, staff, post-doctoral fellows, or students with responsibilities for the design, conduct, or reporting of research, either funded or proposed for funding.

**DEFINITIONS**

These definitions apply to terms as they are used in this policy.

**2.1 Conflict Management**. Measures taken to address the risk of bias or the appearance of bias, protect research subjects, and maintain public trust in the institution’s research and its personnel when research personnel may have a real or apparent financial conflict of interest (FCOI).

**2.2 Design, Conduct or Reporting of Research**. Oversight, decision-making or participation in research that includes creating the structure, roles, and/or protocol of a research project; participating in the execution of the research roles and protocol; participating in the publishing, presentation, or discussion of research results.

**2.3 Disclose/Disclosure**. To provide relevant information about research personnel’s financial interests related to a research project to parties internal or external to the institution to assure full awareness of potential conflicts and institutional efforts to address them.

**2.4 External Entity**. Any entity other than the university.

**2.5 Financial Conflict of Interest—**. A Financial Conflict of Interest (FCOI) occurs when a financial interest, or other opportunity for personal financial gain, could significantly and directly compromise or influence the objective design, conduct, reporting or direct administration of research.

**2.6 Financial Threshold.** For personnel on PHS funded awards or cooperative agreements, the threshold for reporting a Significant Financial Interest (defined below) is $5,000, as per PHS requirements. For all other research, the threshold for reporting a Significant Financial Interest is $10,000. Some agencies require disclosure of all sponsored travel, as well as equity in non-publicly traded companies, regardless of the dollar value (see section 2.9, item 2 and section 2.10 below).

**2.7 Investigator(s)**. Individuals, regardless of title or position, responsible for the design, conduct, or reporting of a research project. *For sponsored research*: principal investigators, co-investigators, and any other individual named in a sponsored project key personnel list.

**2.8 Management Plan.** See *Conflict Management.*

**2.9 Significant Financial Interest (SFI).** A financial interest consisting of one or more of an individual’s interests (or the interests of a spouse or dependent child) that reasonably appears to be related to an individual’s Oklahoma State University responsibilities:

1. With regard to any publicly traded entity, a significant financial interest (SFI) exists if the value of any remuneration received from the entity in the 12 months preceding the disclosure and the value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds the Financial Threshold (defined above). For purposes of this definition, remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value.

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1. With regard to any non-publicly traded entity, an SFI exists if the value of any remuneration received from the entity in the 12 months preceding the disclosure, when aggregated, exceeds Financial Threshold (defined above), or when an individual or his or her family holds any equity interest (e.g., stock, stock option, or other ownership interest).
2. Related to intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests.
3. As required by the federal regulations and only for personnel on PHS funded awards or cooperative agreements issued on or after August 24, 2012, any travel that is reimbursed or paid on the individual’s behalf, related to the individual’s OSU responsibilities **and** determined by OSU to constitute or contribute to an SFI. This excludes any travel that is reimbursed or sponsored by OSU, a federal, state, or local government agency; a U.S., non-profit institution of higher education as defined at 20 USC 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education.

The term significant financial interest (SFI) **does not include** the following types of financial interests:

1. Salaries, royalties, or other remuneration paid by OSU to an individual, including intellectual property rights assigned to the institution and agreements to share in royalties related to such rights.
2. Income from investment vehicles, such as mutual funds and retirement accounts, as long as the individual does not directly control investment decisions made in these vehicles.
3. Income from seminars, lectures, or teaching engagements sponsored by public or non-profit entities or income from service on advisory committees or review panels for a federal, state, or local government agency.

**2.10 Travel Disclosure.** Some agencies, including PHS, require the disclosure of all reimbursed or sponsored travel related to an investigator’s Institutional Responsibilities within 30 days of completing travel.

Sponsored Travel means (a) travel expenses paid to an investigator or travel paid on an Investigator’s behalf, in the past 12-month period and (b) travel reimbursed to or paid on behalf of an Investigator’s spouse or dependent child in the past 12-month period ONLY if such travel reasonably appears to be related to the Investigator’s OSU responsibilities. This disclosure requirement does not apply to travel that is reimbursed or sponsored by OSU, a federal, state, or local government agency; a U.S., non-profit institution of higher education as defined at 20 USC 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with a U.S. institution of higher education. The details of this disclosure will include at a minimum, the purpose of the trip, the identity of the sponsor/organizer, the destination, and the duration.

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**Policy and Procedures**

**3.1 Conflict of Interest Responsibilities of Investigators**—In addition to other responsibilities as specified in this policy, Investigators shall be responsible for:

1. Reading, understanding, and complying with this policy and with the corresponding procedures, as applicable;
2. Informing all co-investigators, staff, students, contractors, sub-recipients, and other individuals responsible for the design, conduct, or reporting of the Investigator’s research of their obligation to comply with this policy;
3. Cooperating with the Office of the Vice President for Research to ensure compliance with all requirements set forth in this policy;
4. Complying with the terms and conditions of applicable disclosures of Significant Financial Interest and conflict management plans as described in this policy and in the related procedures.

**3.2** **Management of Financial Conflicts of Interest**—The Research Conflict of Interest Officer (RCIO) will be appointed by the Vice President for Research (VPR) to administer the disclosure of Investigators’ SFIs under this policy and the related procedures. The RCIO, at her/his discretion, may refer a disclosure of any SFI to the Conflict of Interest Review Committee (a standing committee, described below) if the SFI has the potential to be categorized as an FCOI.

The Vice President for Research will appoint the members of a standing Conflict of Interest Review Committee, which will consist of at least three (3) members of the OSU faculty, staff or administration with relevant background or expertise, with a tenured OSU faculty member designated as the Chair of the Committee.

The Committee will meet, review all disclosures, and determine if any referred SFI constitutes an FCOI and, if so, what modifications or conditions, if any, should be imposed to manage, reduce or eliminate the FCOI.

The Committee may require the Investigator to submit more detailed information regarding the SFI that relates to the project proposed for funding or awarded and may require the Investigator to meet with the Committee. The Committee will take one of the following actions on each disclosure referred for review:

1. Determine that an FCOI does NOT exist;
2. Determine that an FCOI DOES exist; and
   1. Require modifications, conditions, or administrative oversight to reduce or eliminate or manage each conflict for the proposed project;

***OR***

* 1. Require withdrawal of the proposed project.

Examples of conditions or restrictions that might be imposed by the Conflict of Interest Review Committee include, but are not limited to:

1. Public disclosure of FCOI (e.g., when presenting or publishing the research);
2. For research projects involving human subjects research, disclosure of the FCOI directly to participants;
3. Appointment of an independent monitor capable of taking measures to protect the design, conduct, and reporting of the research against bias resulting from the FCOI;

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1. Modification of the research plan;
2. Change of personnel or personnel responsibilities, or disqualification of personnel from participation in all or a portion of the research;
3. Reduction or elimination of the financial interest (e.g., sale of an equity interest); or
4. Severance of relationships that create financial conflicts.

The Conflict of Interest Review Committee will notify the Investigator and the RCIO of the Committee’s decision in writing. If the Investigator does not agree with any modifications or conditions imposed by the Committee or with the Committee’s recommendation that the proposed project be withdrawn, the Investigator will have ten (10) business days following receipt of such notice to appeal the decision to the RCIO. The RCIO will then convene a panel (two or more, depending upon the complexity of the case) of Deans (or the Deans’ designees) who will review the appeal and determine whether to recommend upholding the Committee’s decision or to recommend an alternative decision to the VPR. The RCIO will then communicate the Committee’s original decision, the investigator’s appeal, and the appeal panel’s recommendations to the VPR. Within ten (10) days of receipt of the appeal materials, the VPR will notify the Investigator, the Conflict of Interest Review Committee, and the RCIO of his/her decision in writing. The decision of the VPR will be final.

A copy of any conflict management plan adopted by the Conflict of Interest Review Committee or by the VPR (following an Investigator’s appeal) will be maintained by the RCIO. Any conditions or restrictions to resolve or manage conflicts of interest under the management plan must be implemented before OSU’s expenditure of any funds awarded under a grant or contract.

The Conflict of Interest Review Committee will monitor Investigator compliance with any implemented management plan on an ongoing basis until the completion of the funded project.

**3.3 Retrospective Review**--If an investigator fails to disclose a significant financial interest that the RCIO determines to be a financial conflict of interest related to a particular research project, if the university fails to review or manage a financial conflict of interest, or if an investigator fails to comply with the terms of a conflict of interest management plan, the university will within one hundred and twenty (120) days complete a retrospective review of the investigator’s research to determine whether there was any bias in the design, conduct or reporting of the research. The RCIO will keep a record of the retrospective review and make any necessary reports to funding agencies in accordance with federal regulations.

**3.4** **Maintenance of Records**—The RCIO will maintain records relating to all Investigator disclosures of SFIs and OSU’s actions in response to such disclosures until the later of: (1) at least three (3) years from the date the final expenditure report is submitted to the funding agency, unless the funding agency requires another retention period; (2) the resolution of any governmental action involving such records; (3) the date specified by federal or state law; or (4) any applicable State or institutional records retention schedule.

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**3.5** **Enforcement Mechanisms, Remedies and Noncompliance**—The Office of the VPR shall monitor Investigators and disclosures of conflicts of interest to determine compliance with this policy and related procedures.

Failure to comply with this Policy will be grounds for disciplinary action in accordance with OSU Policy Statement to Govern Appointments, Tenure, Promotions, and Related Matters of the Faculty of Oklahoma State University; OSU Policy 3-0720 (for staff) and OSU Student Code of Conduct.

In addition, Investigators may also be subject to criminal sanctions or civil liability under federal or state law. Violations of full and prompt disclosure may result in the loss of grant funding and sanctions regarding future funding from federal agencies. For PHS funded research, Investigators may also be subject to additional remedies as set out in the applicable Conflict of Interest procedure.

**3.6** **Compliance Reporting**—Any suspected violation of this policy and related procedures must be reported to the RCIO, the University Research Compliance Office, or the VPR.

**References**

US Public Health Service—“Responsibility of Applicants for Promoting Objectivity in Research for Which PHS Funding is Sought,” 42 CFR Part 50

National Science Foundation—“Investigator Financial Disclosure Policy,” 60 Fed. Reg. 35820

NSF Grant Policy Manual (NSF 17-1), Conflict of Interest Policies, Chapter IX.

Approved by Board of Regents: September 1996

Revised: April 2006

Revised/Approved by E-Team: August 24, 2012 (Compliance date)

Approved by Board of Regents: September 14, 2012

Revised: Date 2020

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**ONE-PAGE SUMMARY OF CHANGES FOR POLICY#: 4-0130**

**Name of Policy:** Conflict of Interest

**Submitted by:** Kenneth Sewell **Phone #:** 4-6501

**Department:** Division of Research

**Date:** April 25, 2018

**Significant Changes Made:** This is a major revision of the current COI policy. The policy will reduce the number of individuals subject to the policy; moves the reporting, determination of conflict of interest, and oversight of management or elimination of a conflict of interest from the colleges to a central committee. In addition, the administrative procedures have been moved from the policy into a separate guidancedocument.

**Justification:** The original policy was written more than 20 years ago and the two subsequent revisions (2006 and 2012) made the policy cumbersome and difficult to monitor for compliance. Further, the original policy resulted in the requirement for reporting by individuals not covered in the federal regulations related to sponsored research which established the need for the policy. In addition, little administrative guidance was provided to the units responsible for carrying out major components of thhe previous policy, resulting in inconsistent application of the policy across the university. Providing administrative guidance as a separate document will allow the university to modify and update guidance more quickly in the future as the need arises. Finally, the title is changed to reflect the focus on sponsored research contexts in which conflicts of interest are required to be disclosed and managed as per federal regulations.

**Those Involved in These Changes:** Office of the Vice President for Research; Associate Deans for Research

**Has this policy been revised to include the OSU--System?** Although the over-arching policy is intended to apply across the system, individual campuses may need to adopt administrative procedures specific to the needs of the campus.

**Does this policy need Board approval? If there is any question about this, please check with Legal Counsel.** Yes

**Do any other policies need to be updated to reference this policy?** No

**Plans to communicate this policy or changes when policy is approved:** A general announcement of the revision will be made to the research community via the Associate Deans for Research and the SPRC group (research administrators across campus).

**Oklahoma State University Policy and Procedures**

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| **CONFLICT OF INTEREST** | **4-0130**  **RESEARCH**  **August 2012** |

# INTRODUCTION

* 1. As an institution dedicated to excellence in education, research and outreach, Oklahoma State University places a high value on research integrity and academic freedom. Objectivity in the conduct of research, the freedom to disseminate ideas through publication of research results, the protection of the rights and interests of research participants, maintenance of public trust, and the ability to ensure that our responsibility to our students and trainees is not compromised are critical to these institutional values. Relationships with industry and other outside entities, while important to the support and advancement of research, can present special challenges in protecting these institutional values.
  2. This policy addresses situations where there might be a potential financial conflict between a particular outside interest of an employee and the obligation that the employee owes to the University such that an employee’s profit or advantage may come, or reasonably appear to come, at the expense of the well-being of the University.
  3. The purpose of this policy is to aid in identifying apparent, actual, and potential conflicts of interest and guide the subsequent management of them so as to assure that such conflicts do not improperly affect the activities or professional conduct of the University or its employees.
  4. It is not the intent of this policy to restrict legitimate work appropriate to the employee’s profession, discipline, or outside interests, but only to provide the University with authority to take action that is appropriate, proportionate, and focused on substantial conflicts of interest that may compromise or be perceived to compromise an employee’s professional judgment.

# STATEMENT OF GENERAL POLICY

* 1. Oklahoma State University is a public institution committed to the mission of teaching, research and extension/outreach. To these ends, the institution balances an assortment of principles: maintaining an atmosphere that promotes free and open scholarly inquiry; facilitating the transfer of information and technology for the benefit of the public; and serving as a prudent steward of public and private resources entrusted to it. Employees have a primary commitment to their basic University duties of teaching, research and creative activity, and service. These basic duties often limit outside activities. As a result, professional and personal activities may present conflict of interest situations which should be evaluated under the auspices of this and other applicable policies.
  2. Employee participation in outside professional, commercial and *pro bono* activities can make important direct and indirect contributions to the strength and vitality of the University.

Through participation in such activities, employees may add to knowledge and understanding that is relevant and useful to teaching and research within the University, develop sources of funding and support for activities carried out in the University, and establish relationships valuable to the University. Because of its value to the University, its rewards to employees, and its contributions to the larger society of which the University is a part, the University recognizes that employee participation in outside professional, commercial, or *pro bono* activities is often appropriate.

* 1. Sound professional discretion is an integral part of the University’s conflict of interest system. Any review of a potential conflict of interest will be undertaken in light of four general propositions. First, conflicts of interest per se are inevitable, and do not necessarily represent any impropriety by employees if disclosed in advance. Second, the failure to disclose a conflict of interest for administrative review and response would be a serious mistake for any employee, and may be a breach of this policy. Third, there is a presumption in favor of allowing employees to act in dual roles once the conflict of interest has been disclosed. (Prior approval is required in cases of potential conflicts involving federal grants or contracts. See 5.02 below.) Fourth, conflicts of interest may be so profound or substantial under some circumstances that it would be best for all concerned if the employee did not participate in a particular transaction.
  2. It is not possible to completely eliminate the potential for conflict of interest because there are certain rewards and incentives that are inherent or appropriate in the structure of a university enterprise. Such conflicts become detrimental when the potential temptations, financial or otherwise, undermine reasonable objectivity in the design, conduct and reporting of research; setting University policies; managing contracts; selecting equipment and supplies; involving students in sponsored projects; or performing other roles in University governance in which objectivity and integrity are paramount. Furthermore, since allegations of conflicts of interest based on appearances can undermine public trust in ways that may not be adequately restored even when mitigating facts are brought to light, apparent conflicts should be avoided, when feasible and appropriate.
  3. Other sections of this Policy notwithstanding, it is the ongoing responsibility of the

employee to abide by the provisions of all other applicable federal, state, and University’s laws and policies relating to conflicts of interest; and to disclose and seek guidance on such matters from the Appropriate Administrator.

* 1. A conflict of interest exists when a Significant Financial Interest could substantially compromise an employee’s judgment in the performance of University duties. A conflict of interest depends on the situation and not on the character or actions of an individual.
  2. Employees are responsible for disclosing Significant Financial Interests that would reasonably appear to be affected by or to affect their University duties. However, it is the responsibility of the University, not the discloser, to determine if the disclosed interest could significantly affect the performance of University responsibilities and to require the management, reduction, or elimination of the conflict.

# DEFINITIONS

* 1. Appropriate Administrator: The senior administrator in whom authority resides over the particular unit in which the individual is employed will provide oversight.
  2. Compensation: All remuneration or other things of value received in payment for services rendered is considered to be compensation. This can include salary or other forms of payment including gifts, stocks, or other items of significant financial value.
  3. Employee: Any person possessing either a full-time or part-time appointment at the University who is eligible to receive benefits and receives a salary or wage for his/her defined responsibilities. This definition does not include temporary employees appointed thirty (30) days or less or a member of the Board of Regents of Oklahoma State University. For application of this policy, this definition may include students, both undergraduate and graduate, who work on a grant or contract and have responsibility, in whole or in part, for the reporting of research.
  4. Family: An employee’s spouse and dependent children.
  5. Institutional responsibilities: An Investigator’s professional responsibilities on behalf of the institution, including research, research consultation, teaching, professional practice, institutional committee memberships, and service on panels such as Institutional Review Boards.
  6. Investigator (for disclosures made as required by Public Health Service (PHS) regulations): An Investigator is the project director or principal investigator and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of research funded by PHS (e.g., NIH).
  7. Serious Breach: A serious breach of this policy is a failure to disclose or prohibited action in conscious disregard of this policy. Conscious disregard is a mental state embracing either (i) intent to deceive, manipulate or defraud; (ii) guilty knowledge; or (iii) moral awareness that the alleged conduct violated the policy.
  8. Significant Financial Interest (for all disclosures except those made as required by PHS regulations): Anything of monetary value, including, but not limited to, salary or other payment for services (e.g., consulting fees or honoraria); equity interests (e.g., stocks, stock options, or other ownership interests); and intellectual property rights (e.g., patents, copyrights, and royalties from such rights).

The term does **not** include:

* + 1. salary, royalties, or other remuneration from Oklahoma State University;
    2. income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities;
    3. income from service on advisory committees or review panels for public or nonprofit entities;
    4. equity interest in mutual funds whose investments are not directly controlled by the employee;
    5. an equity interest that, when aggregated for the employee and the employee’s spouse and dependent children, meets **all** of the following tests:
       1. does not exceed ten thousand dollars ($10,000) in value as determined through reference to public prices or other reasonable measures of fair market value;
       2. does not represent a five percent (5%) or more ownership interest in any single entity; and
       3. did not yield dividends of one thousand dollars ($1000) or more during the preceding calendar year; or
    6. salary, royalties, or other payments that, when aggregated for the employee and the employee’s spouse and dependent children over the next twelve months, are not reasonably expected to exceed ten thousand dollars ($10,000).

Potential equity value should be considered in those instances where the employee has an equity interest in a privately-held company and the potential exists for bias in design, conduct, or reporting of research based on future financial benefit; the true value of that interest may not be known until the firm goes public, but the faculty or staff employee should make a reasonable assessment of the future market value of the equity.

Regardless of the above minimum requirements, an employee, in his or her own best interest, is encouraged to disclose any other financial or related interest that could present an actual conflict of interest or reasonably be perceived to present a conflict of interest. Disclosure is a key factor in protecting one’s reputation and career from potentially embarrassing or harmful allegations of inappropriate behavior. Employees are encouraged to ask for guidance from their department chair/head or dean even in situations that are not covered by the disclosure procedures in this policy.

* 1. Significant Financial Interest (when reported as required by PHS regulations): For the purpose of disclosing in compliance with PHS regulations, Significant Financial Interest is:
     1. A financial interest consisting of one or more of the following interests of the Investigator (and those of the Investigator’s spouse and dependent children) that reasonably appears to be related to the Investigator’s institutional responsibilities:
        1. With regard to any **publicly traded entity**, a Significant Financial Interest exists if the value of any remuneration received from the entity in twelve (12) months preceding the disclosure and the value of any equity interest in the entity as of the

date of the disclosure, when aggregated, exceeds $5000. (For purposes of this definition, remuneration includes:

* + - * 1. Salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship)
        2. Equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value
      1. With regard to any **non-publicly traded entity**, a Significant Financial Interest exists if the value of any remuneration received from the entity in the twelve (12) months preceding the disclosure, when aggregated, exceeds $5000, OR when the Investigator (or the Investigator’s spouse and dependent children) hold any equity interest (e.g., stock, stock option, or other ownership interest); or
      2. Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests.
    1. Investigators also must disclose the occurrence of any reimbursed or sponsored travel (i.e., that which is paid on behalf of the Investigator) related to their institutional responsibilities. This disclosure does not apply to travel that is reimbursed or sponsored by a federal, state, or local government agency, an institution of higher education (as defined at 20 USC 1001(a)), an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education. The disclosure must include:
       1. The purpose of the trip
       2. The identity of the sponsor/organizer
       3. The destination
       4. The duration
    2. Significant Financial Interest does not include:
       1. Salary, royalties, or other remuneration paid by the institution to the Investigator if the Investigator is currently employed or otherwise appointed by the institution, including intellectual property rights assigned to the institution and agreements to share in royalties related to such rights;
       2. Any ownership interest in the institution held by the Investigator, if the institution is a commercial or for-profit organization;
       3. Income from investment vehicles, such as mutual funds and retirement accounts, as long as the Investigator does not directly control the investment decisions made by these vehicles;
       4. Income from seminars, lectures, or teaching engagements sponsored by a federal, state, or local government agency, an institution of higher education (as defined at 20 USC 1001(a)), an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education;
       5. Income from service on advisory committees or review panels for a federal, state, or local government agency, an institution of higher education (as defined at 20 USC 1001(a)), an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education.

3.10 University Resources: All University facilities, personnel, equipment, property, materials or proprietary information constitute University resources.

# DISCLOSURE

* 1. Who must disclose:
     1. Tenured and tenure-track faculty
     2. Research professors, associate research professors, and assistant research professors
     3. Professors, associate professors, and assistant professors with renewable-term appointments
     4. Research scientists and senior research scientists
     5. Administrators
     6. Employees whose annual salary exceeds $60,000
     7. Any employee who is responsible for the design, conduct, or reporting of a research project funded by or proposed for funding by Federal agencies that require such disclosures
  2. When must disclosure be filed:
     1. Whether or not there is any Significant Financial Interest to report, covered employees should file an annual report by October 1 each year
     2. Any employee who has an actual conflict of interest must report it whenever it occurs
     3. Prior to submission of grant/contract proposals to Federal agencies any employee responsible for the design, conduct or reporting of research must disclose, whether or

not an actual conflict or potential conflict exists. Federal regulation further requires the disclosure to be updated annually or when new reportable Significant Financial Interests are obtained

* + 1. When an employee reasonably believes a potential conflict of interest may exist
  1. What must be disclosed:

In completing the conflicts of interest reporting form, employees must disclose those Significant Financial Interests that would reasonably appear to affect, or to be affected by, their University duties.

# PROCEDURES FOR DISCLOSURE, REVIEW AND MANAGEMENT OF POTENTIAL CONFLICTS OF INTEREST

* 1. Disclosure

Every employee of the University subject to this policy shall make annual disclosure of any significant financial interest(s), as defined in 3.09 of this policy, which would reasonably appear to be a conflict of interest. This disclosure shall be made in writing to the Appropriate Administrator (Deans and Vice Presidents will disclose to the Provost and Senior Vice President). The Appropriate Administrator may consult with advisory personnel, group or committee appointed for that purpose pursuant to policies and procedures established by the University or with others in connection with the review, and upon completion, shall advise the employee in writing of his or her decision, and the reasons for the decision, to accept (with or without modifications), return for more information or reject the recommendations. If accepted, the notification shall include, among other things, requirements for immediate action and plans for continued monitoring of the potential or actual conflict.

Employees shall provide at least ten (10) University working days for review of their disclosure prior to making any commitment that could reasonably lead to a conflict. However, in the event the ten (10) working day time period is not feasible, the employee should identify the need for expedited review and submit the request to the Appropriate Administrator. Any changes that occur in an employee’s significant interests during the year shall be disclosed promptly and reviewed in the manner described above.

* 1. Prior approval
     1. As required by federal law and regulations, all financial disclosures must be made, and all identified conflicts of interest must be satisfactorily managed, reduced or

eliminated prior to the University’s submission of proposals and expenditure of funds under the award, in accordance with the institution’s conflict of interest policy.

* + 1. Although there is a presumption in favor of allowing employees to act in dual roles once a conflict of interest has been disclosed, an employee shall not proceed with proposed activity prior to University evaluation as detailed in 5.01.
  1. Examples of Management of Conflicts of Interest

Conditions or restrictions that might be imposed by the University to manage, reduce or eliminate actual or potential conflicts of interest include but are not limited to:

* + 1. public disclosure of relevant information regarding the conflict of interest, such as all relevant significant financial interests;
    2. monitoring of research by independent reviewers;
    3. modification of the research plan, activity or agreement to eliminate or minimize the conflict of interest;
    4. designation of an appropriate University representative to have immediate oversight responsibility over the management plan;
    5. divestiture of significant financial interests;
    6. disqualification from participation in the portion of the activity that would be affected by the significant financial interests;
    7. severance of the relationships that create actual or potential conflicts;
    8. termination of student involvement in the project.

Some Federal funding agencies permit research to proceed, in spite of disclosed conflicts, if the review determines that imposing restrictions or conditions would be either ineffective or inequitable, and that the potential negative impacts that may arise from a significant financial interest are outweighed by interests of scientific progress, technology transfer, or the public health and welfare. However, the University is ultimately responsible for the determination of whether a research or educational project that involves a conflict should proceed.

All management plans must be focused and narrowly tailored to minimize or eliminate improper conflicts of interest.

* 1. Management Plan Reports

After development of an acceptable management plan and commencement of the work, the appropriate individuals with oversight responsibility will regularly report, in writing, to the Appropriate Administrator on the effectiveness of the plan. The frequency of such reports shall be determined by the Appropriation Administrator but shall in all events be at least annually.

* 1. Modification of Management Plans

If, after sufficient experience to assess the effectiveness of the management plan and after notice to and full consultation with all appropriate parties, the Appropriate Administrator determines that the conflict has not been properly managed or has become unmanageable, he/she may modify the plan.

* 1. Institutional Reporting Requirements

If outside agencies require notification of conflict resolution and management, they will be notified in accordance with their requirements.

* 1. Forms

The forms for the Financial Conflict of Interest Disclosure are at the end of this policy. The Provost and Senior Vice President shall provide annual notice (e.g., by posting on the University web site) and explanation of the forms to be used in the disclosure process for the coming year.

* 1. Retrospective Sanctions

It is understood that employees shall clearly, fully and truthfully disclose, in writing, all activities, relationships, or interests that might present conflicts of interest. Nevertheless, there shall be no retrospective sanctions under this policy for the period of time after the ten (10) day review period, detailed in paragraph 5.01, when the Appropriate Administrator knew of such activities, relationships, or interests, and, acting in good faith, took no action to manage, minimize, or eliminate them.

# UNIVERSITY ADMINISTRATOR RESPONSIBILITIES

6.01 Because of the special role that chairs of departments and committees, deans of colleges and schools, the Provost and Senior Vice President, the President, and other senior academic officials play in administering the affairs of the University, it is especially important that employees serving in these administrative positions avoid involvements in outside professional and commercial activities that pose potential conflicts of interest with the fulfillment of their responsibilities to the University. The necessary involvement of these administrative officials in the appointment and promotion process, in decisions concerning students, and in the supervision of other faculty requires that they be especially sensitive to potential conflicts of interest and that they uphold a particularly rigorous standard for avoiding such conflicts.

# CONSEQUENCES OF POLICY VIOLATIONS

* 1. Employees are subject to the ordinary disciplinary process of the University if they fail to fully and truthfully disclose activities or relationships that could reasonably be viewed as conflict of interest situations or fail to comply with any stipulated plan for managing the disclosed conflict. (See Faculty Handbook General Policy Statement Sections 1.12 through 1.16, “Administrative Suspensions,” Section 1.13 “Disciplinary Actions,” and Appendix C “General Termination Procedures;” Policy and Procedures Letter No. 3-0710 “Resignations for Classified Staff;” Policy and Procedures Letter No. 3-0726 “Employment, Resignation, Suspensions, and Dismissals for Administrative and Professional Staff;” Policy and Procedures Letter No. 3-0746 “Grievances and Complaints for Staff.”) In addition, they may be subject to criminal sanctions or civil liability under federal and/or state law.
  2. Failure to disclose known conflicts of interests or to follow an appropriate prescribed management plan may be a serious breach of this policy and may itself be considered ethical misconduct or professional dishonesty.
  3. Allegations against an employee for breach of this policy should be reported in a confidential writing to the employee’s supervisor.

# MISCELLANEOUS PROVISIONS

* 1. Confidentiality

All information disclosed by an employee for the purpose of disclosure and management, and all official records of disclosure and management shall be considered a part of the employee’s personnel file or student file and shall be deemed confidential. Any information disclosed by an employee as required by this policy shall be used solely for the purpose of administering and/or executing this policy and may not be disclosed or used for any other purpose unless required by law. Unauthorized disclosure of any such information shall be deemed to be unethical behavior and a violation of this policy and subject to appropriate disciplinary action.

The University is required to make information available, upon request, to Federal agencies sponsoring work at the University regarding all conflicting interests associated with the funded project identified by the University and how those interests have been managed, reduced, or eliminated to protect the research from bias. The University maintains records of all financial disclosures and all actions taken by the University with respect to each conflicting interest for a reasonable period of time. For sponsored research activities, records will be retained for at least three years from the date of submission of the final expenditures report or where applicable, from other dates specified by requirements of the sponsoring agency. The above notwithstanding, all such records shall be retained for the period of time as may be required by law.

* 1. Relationship to other University policies

There are a number of University policies that govern the duties and responsibilities of University employees which, while not repeated here, nevertheless may apply to conflict of interest situations.

* 1. Conflict of interest laws

In addition to this policy, the state has imposed laws and rules governing conflicts of interest in state employment. This Policy overlaps with but does not supplant University employees’ responsibilities under state or federal law, which in some instances will include additional, and sometimes different, prohibitions, penalties and reporting duties. Relevant state laws/rules are available at the Office of University Legal Counsel. Federal conflicts of interest laws also may be applicable to those who receive federal grants/contracts or to those employed partly by federal agencies. By reference thereto, this policy includes all requirements relating to conflicts of interest to which the University and/or its employees are subject under state or federal law.

* 1. Freedom of expression and academic freedom

This policy does not purport to prohibit expressive conduct protected from severe sanctions, punishment, or other undue burdens by the Constitutions of the United States and of Oklahoma. Specifically, nothing in this policy shall be construed to authorize the University to take adverse action against any employee for consulting or outside professional activities because of the

employee’s viewpoint, ideology, creed, political opinion, or for any other political motivation.

* 1. Training Requirements

Individuals filing disclosures in compliance with PHS regulations have an additional responsibility to complete conflict of interest training prior to engaging in PHS-funded research and at least every four years. In addition, training must be completed immediately under designated circumstances:

* + 1. Institutional Financial Conflict of Interest policies change in a manner that affects Investigator requirements
    2. An Investigator is new to the institution
    3. The institution finds an Investigator is not in compliance with the OSU Financial Conflict of Interest policy or a management plan.

Approved by Board of Regents: September 1996 Revised: April 2006

Revised/Approved by E-Team: August 24, 2012 (Compliance date) Approved by Board of Regents: September 14, 2012

# APPENDIX A

The following examples are intended to illustrate the reporting requirements of OSU’s Conflict of Interest Policy. They are keyed to the disclosure form found at the end of this policy.

Inquiries should be directed to the appropriate administrator. Do you have an Interest in an entity or activity that…

1. does business with the University in an area in which you make spending decisions?

Example A1. The director of a research unit intends to purchase a large piece of equipment. There are several possible vendors. One vendor is a small company owned by the director. *Purchasing decision reasonably appears affected by outside interest—disclosure is required.*

Example A2. Same facts as above, but vendor is a large, multinational corporation in which director owns shares of stock worth less than $10,000. *Outside interest may profit from University activities, but interest is not significant— disclosure is not required.*

1. profits from the sale of course material (coursepacks, software, etc.) or other goods or services to students whom you teach or evaluate?

Example B1. A faculty member has created a custom software package that provides interactive tutoring specifically designed for his/her calculus course. The faculty member invites all 500 students in the calculus class to purchase the package at a per-unit markup of $20. *Outside interest profits from University activities— disclosure is required. Additionally, activity may implicate state law prohibition against private profit from public employment, and University policy regarding sale of course materials to students.*

Example B2. An accounting faculty member works each summer for a private corporation that offers test-prepared courses to students planning to take the CPA exam. *Outside interest related to University activities, but neither affected by the other—disclosure is not required.*

1. employs University faculty, staff or students who you directly supervise or evaluate in that employment and also supervise or evaluate at the University.

Example C1. The husband of a faculty member in Engineering owns a small research company and wishes to hire graduate students whose thesis research the faculty member supervises. *Student evaluated by faculty member is directly supervised in private concern by spouse—disclosure is required.*

Example C2. A faculty member in the Department of History is the director of a bank. Some of the bank’s employees are students; some are students of the faculty

member; but none are directly supervised in their employment by the faculty member. *Interest employs faculty member’s students, but faculty member does not supervise them—disclosure is not required.*

1. sponsors a project at the University over which you have any degree of control?

Example D1. A faculty member is employed as a consultant by a corporation that makes computer chips and is also the principal investigator on a University research project funded by the corporation. *Interest profits from faculty member’s University duties—disclosure is required.*

1. profits from research you do at the University?

Example E1. A faculty member works as a private consultant for a biotechnology company on projects related to his/her University research program. During the past year he/she eared more than $10,000 in consultant fees. In addition, he/she has submitted a grant application to NIH for support of a research project related to the business interests of the company. *Outside interest may profit from research activities—disclosure is required.*

1. competes with the University for project funding in the area of your University duties.

Example F1. Through a contract between his/her department and a state agency, a faculty member provides training to state agency workers. The following year, the faculty member offers to contract personally with the agency to provide the same training. *Faculty member competes with the University for project funding— disclosure is required.*

1. uses University-owned intellectual property, or University equipment or facilities.

Example G1. Faculty member provides information on his/her private consulting service on his/her University website. *Interest profits from use of University facilities—disclosure is required. Additionally, state law prohibiting private use of public property may be implicated.*

OKLAHOMA STATE UNIVERSITY CONFLICTS OF INTEREST REPORTING FORM

Name Department

The information you provide is confidential and will be used only as required to report and manage conflicts of

interest as described in OSU Policy and Procedures 4-0130. Return this form directly to the appropriate administrator.

1. Do you have an interest in an entity or activity that
   1. does business with the University in an area in which you make spending decisions?
      * Yes No
   2. profits from the sale of course material (coursepacks, software, etc.) or other goods or services to students whom you teach or evaluate?
      * Yes No
   3. employs University faculty, staff or students who you directly supervise or evaluate both in that employment and at the University?
      * Yes No
   4. sponsors a project at the University over which you have any degree of control?
      * Yes No
   5. profits from research you do at the University?
      * Yes No
   6. competes with the University for project funding?
      * Yes No
   7. uses University-owned intellectual property, or University equipment or facilities?
      * Yes No
2. Other than those covered in Question 1, do you have an interest in any entity or activity that could reasonably appear to affect, or be affected by, the exercise of your University responsibilities?

* Yes No

1. Do you have any interests reported in Questions 1 or 2 that are not already subject to a conflict management plan? (Leave blank if no interests reported.)

* All interests are subject to an existing conflict of interest management plan.
* At least one interest is not subject to an existing conflict of interest management plan.

If you had no interests to report, or if the interests reported are already subject to a conflict of interest management plan, skip Questions 4 and 5, sign below, and return this form to the appropriate administrator. Otherwise, please complete Questions 4 and 5 before signing. *A “Yes” to Questions 1 or 2 does not mean that a conflict exists, but you may be asked to provide further information about the activity.*

1. Continuing on a separate sheet if necessary, please describe:
   1. The nature of the entity or activity (type and name of businesses, etc.):
   2. Your relationship to the entity or activity (including your position or title, if any):
   3. The *nature* of your interest (ownership, salary, equity interest, etc.) and its *extent* (full ownership, salary in excess of $10,000, etc.):
   4. The nature of the potential conflict:
2. Does the interest or your related University responsibility involve receipt of federal funding?

* Yes No

I have read and understood the Oklahoma State University Financial Conflict of Interest Policy and declare that

I have used all reasonable diligence in preparing this disclosure statement, which to the best of my knowledge is true, accurate, and complete. I understand that under the Policy I have a responsibility to update the above information throughout the coming year if my circumstances change.

Signature Date

OKLAHOMA STATE UNIVERSITY CONFLICTS OF INTEREST REPORTING FORM

(For Disclosures Required by PHS Regulations)

Name Department

The information you provide is confidential and will be used only as required to report and manage conflicts of

interest as described in OSU Policy and Procedures 4-0130. Return this form directly to the appropriate administrator.

1. Do you, your spouse or dependent children have an interest in an entity or activity that
   1. does business with the University in an area in which you make spending decisions?
      * Yes No
   2. profits from the sale of course material (coursepacks, software, etc.) or other goods or services to students whom you teach or evaluate?
      * Yes No
   3. employs University faculty, staff or students who you directly supervise or evaluate both in that employment and at the University?
      * Yes No
   4. sponsors a project at the University over which you have any degree of control?
      * Yes No
   5. profits from research you do at the University?
      * Yes No
   6. competes with the University for project funding?
      * Yes No
   7. uses University-owned intellectual property, or University equipment or facilities?
      * Yes No
2. Other than those covered in Question 1, do you, your spouse or dependent children have an interest in any entity or activity that could reasonably appear to affect, or be affected by, the exercise of your University responsibilities?

* Yes No

1. Do you have any interests reported in Questions 1 or 2 that are not already subject to a conflict management plan? (Leave blank if no interests reported.)

* All interests are subject to an existing conflict of interest management plan.
* At least one interest is not subject to an existing conflict of interest management plan.

If you had no interests to report, or if the interests reported are already subject to a conflict of interest management plan, skip Questions 4 and 5, sign below, and return this form to the appropriate administrator. Otherwise, please complete Questions 4 and 5 before signing. *A “Yes” to Questions 1 or 2 does not mean that a conflict exists, but you may be asked to provide further information about the activity.*

1. Continuing on a separate sheet if necessary, please describe:
2. The nature of the entity or activity (type and name of businesses, etc.):
3. Your relationship to the entity or activity (including your position or title, if any):
4. The *nature* of your interest (ownership, salary, equity interest, etc.) and its *extent* (full ownership, salary in excess of $5,000, etc. Please refer to the definition in 3.09):
5. The nature of the potential conflict:
6. Does the interest or your related University responsibility involve receipt of federal funding?
   * Yes No

I have read and understood the Oklahoma State University Financial Conflict of Interest Policy and declare that

I have used all reasonable diligence in preparing this disclosure statement, which to the best of my knowledge is true, accurate, and complete. I understand that under the Policy I have a responsibility to update the above information throughout the coming year if my circumstances change.

Signature Date

REIMBURSED OR SPONSORED TRAVEL DISCLOSURE

As Required by PHS Regulations

Name Department

*PHS Regulations require the disclosure of any reimbursed or sponsored travel related to Investigator’s institutional responsibilities. This disclosure DOES NOT apply to travel that is reimbursed or sponsored by a federal, state, or local government agency, an Institution of higher education, an academic teaching hospital, a medical center, or a research institute affiliated with an Institution of higher education.*

**Trip 1**

Purpose of trip:

Trip sponsor/organizer:

Destination:

Trip duration:

**Trip 2**

Purpose of trip:

Trip sponsor/organizer:

Destination:

Trip duration:

**Trip 3**

Purpose of trip:

Trip sponsor/organizer:

Destination:

Trip duration:

Please use additional sheets if necessary