In 2012, Harvard adopted the University Policy on Individual Financial Conflicts of Interest and began capturing the information necessary to implement this policy in the financial conflict of interest (fCOI) system. In 2020, schools across the University came together to design a new system – the Outside Activities and Interests Reporting (OAIR) platform – to streamline disclosure practices and facilitate compliance with University policies and federal regulations regarding outside activities and interests. In addition to replacing the fCOI system, OAIR has prompted changes to the fCOI policy and school-level processes. The following guidance clarifies common questions regarding these changes.

If you have a question that is not answered below, please contact Megan Moore (megan_moore@harvard.edu) or Kristen Harding (kharding@fas.harvard.edu). You may also direct technical inquiries to oairhelp@harvard.edu.

1. **Has there been a change to what is considered an internal activity that is part of my institutional responsibilities as opposed to an outside professional activity? Do I need to disclose internal activities in OAIR?**

   No, the new system does not change what is considered an internal activity that is part of your institutional responsibilities. As has been the case under the fCOI policy, activities that may be considered internal only need to be disclosed in OAIR when required by applicable federal regulations. Examples of such activities include speaking engagements and review panel services in which you were compensated more than $5,000 in the preceding twelve months for non-profit organizations, professional organizations, and any other outside entities that are not US-based government agencies, US-based institutions of higher education or affiliated research institutes, or US-based academic teaching hospitals, as stipulated by Public Health Service (PHS) requirements. The only new disclosure requirement in this context is that all speaking engagements and review panel services for entities outside the US should be disclosed regardless of compensation (i.e., the $5,000 disclosure threshold has been removed for these activities). Please note that you should still report any internal activities in your annual Faculty Activity Report.

2. **Would reviewing one paper for an outside entity or journal constitute editorial services that need to be disclosed in OAIR?**

   In general, no, this would be considered an internal activity (see FAQ 1). If you are paid $5,000 or more for such services, however, then the expectation is that such an activity...
rises to the level of a professional relationship that falls outside of your institutional responsibilities and would therefore need to be disclosed in OAIR.

3. **What is the difference between what needs to be disclosed in OAIR versus in fCOI?**

While the categories which comprise outside activities and interests have not changed, the $5,000 threshold for disclosure has been removed in most instances, meaning applicable activities and interests are required to be disclosed in OAIR regardless of their value or compensation. The $5,000 threshold only remains for activities that may be considered internal, as addressed in FAQs 1 and 2, as well as travel support and reimbursed travel as listed below. In general, you should disclose all outside activities that are related to your academic or research area and have a time commitment, as well as outside financial interests of any value in public or private companies that are related to your academic or research area, unless they meet any of the exclusion criteria described in OAIR or the associated guidance (including these FAQs).

Examples of outside activities and interests that were not subject to disclosure in the fCOI system but need to be disclosed in OAIR include:

- Equity interests of less than $5,000 in publicly traded companies
- Employment and consulting agreements with entities other than Harvard that are unpaid or paid less than $5,000 per year and have a time commitment
- Appointments at or affiliations with entities other than Harvard that are unpaid or paid less than $5,000 per year and have a time commitment
- Executive roles that are unpaid or paid less than $5,000 per year and have a time commitment
- Teaching courses or substantial portions of courses outside of Harvard (aside from joint programs) that are unpaid or paid less than $5,000 per year
- Media appearances and expert testimonies that are unpaid or paid less than $5,000 per year
- Participation in foreign talent recruitment or development programs that are unpaid or paid less than $5,000 per year
- Conducting research or otherwise being listed on sponsored awards at institutions other than Harvard regardless of compensation
- Inventorship/authorship on intellectual property that has been licensed to an outside entity (including but not limited to inventions, copyrighted works, and/or trademarks) regardless of whether royalties have been received
- Speaking engagements for entities based outside the US regardless of compensation
- Reimbursed travel or travel costs paid on your behalf by a third party valued at $5,000 or more in the past year – except from US-based government agencies, US-based institutions of higher education or affiliated research institutes, and US-based academic teaching hospitals – regardless of whether you are an Investigator on a PHS award or proposal
Note that the above categories of activities and interests are in addition to those which have consistently required disclosure under the fCOI policy, including all relevant activities and interests over $5,000 in value.

4. I recently submitted a disclosure through the fCOI system. Do I need to disclose again in OAIR?

Yes, you do need to disclose again in OAIR. As part of moving to a single annual disclosure period, it was necessary to require individuals who happened to have annual disclosure due dates close to the OAIR launch date to re-disclose within a relatively short time frame. Due to technical limitations, it was not feasible to migrate information from fCOI to OAIR in a way that would have avoided needing to re-enter information.

5. When do I need to submit a disclosure?

As has been the case under the fCOI policy, you are required to submit a disclosure on an annual basis and disclosure updates within 30 days of acquiring a new significant financial interest. Unlike before, Investigators listed on sponsored projects through FAS/SEAS will also be prompted by OAIR to complete an attestation specific to each project at the time of award and update their full disclosure if needed. At system launch, this requirement will only be triggered for NIH, NSF, and other sponsors which have adopted the PHS fCOI requirements, but it will be extended to all sponsored projects later in 2021. The 2021 annual disclosure period for FAS/SEAS is February 1 to March 31. In subsequent cycles, the disclosure period will move to the December to January timeframe, roughly overlapping with the Faculty Activity Report period.

6. Which activities and interests need to be disclosed in OAIR within 30 days and which can wait until the annual disclosure period?

Outside activities and interests that meet the definition of a significant financial interest should be added to your disclosure within 30 days of acquiring or commencing the activity or interest. Everything else can wait until the annual disclosure period.

7. Do I need to disclose outside activities and interests that are not related to my institutional responsibilities?

No, you only need to disclose outside activities and interests that are related to your academic or research area at the University. Please note that relatedness should be

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1 “Significant Financial Interest” includes (1) financial compensation above $5,000 when aggregated over preceding 12 months; (2) equity and other financial interests above $5,000; (3) equity interests of any amount, or entitlement to the same, in a non-publicly traded entity; and (4) intellectual property rights and interests (e.g. patents, copyrights), upon receipt of income related to such rights and interests.
construed broadly and is not limited to outside activities and interests that you believe may conflict with your institutional responsibilities.

8. **Who oversees OAIR?**

FAS Research Administration Services oversees OAIR within FAS/SEAS, with Megan Moore, Senior Director of Research Compliance, serving as the Designated Institutional Official. The Office of the Vice Provost for Research and Standing Committee on Conflicts of Interest oversee OAIR at the University level.

9. **Do I need to disclose all talks given outside the US or just those given in certain countries?**

You need to disclose all talks given outside the US regardless of country (and compensation). Only talks given at US-based government agencies, US-based institutions of higher education or affiliated research institutes, or US-based academic teaching hospitals are exempt from disclosure altogether.

10. **How is my data protected once it has been collected?**

OAIR is a secure system to which a limited number of designated staff have access. For FAS/SEAS, access is limited to designated staff within FAS Research Administration Services. Beyond this, disclosures are only shared on a need to know basis, such as with designated staff at other Harvard schools or affiliates for faculty and Investigators who hold joint appointments. Please note that FAS/SEAS Faculty Affairs and other administrators responsible for reviewing effort commitments may receive regular reports from OAIR with high level information, such as entity name, position/title, and hours of service provided. This is a necessary function of having OAIR serve as the single system for the disclosure of outside activities and interests, replacing the “Outside Activities” section of the Faculty Activity Report, as well as enabling comprehensive review of matters of effort commitment.