

Harvard University Faculty of Arts & Sciences
Outside Activities and Interests Reporting Frequently Asked Questions
Last Updated February 25, 2021

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 oirhelp@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. 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 to an extent, 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 financial interests that are related to your University responsibilities as well as all outside activities that are related to your University responsibilities and have a time commitment, 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 ongoing affiliations with entities other than Harvard that are unpaid or paid less than \$5,000 per year and have a time commitment unless these activities are expressly excluded elsewhere in this guidance
- 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 patents that have been licensed to an outside entity regardless of whether royalties have been received
- 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. How can I access the disclosures I submitted in the past?

You can access your past disclosures by logging into [OAIR](#), clicking on your name in the top-right corner of the screen and selecting “My Profile” from the drop-down, then clicking on “Access Legacy Certifications” under your contact information. You should then see a list of PDFs of your past disclosures.

6. 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.¹ 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.

7. What period does the annual disclosure cover?

The annual disclosure should include all related outside activities and interests that were valid during the 12 months immediately preceding your disclosure date.

8. I received a system-generated email about my disclosure and have a question in reply. Who should I contact?

You can contact Megan Moore (megan_moore@harvard.edu) or Kristen Harding (kharding@fas.harvard.edu) with questions about disclosure requirements and

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.

procedures and oirhelp@harvard.edu with technical questions. Please do not reply to the system-generated email.

9. 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 interest¹ 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.

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

No, you only need to disclose outside activities and interests that are related to your responsibilities at the University. Please note that relatedness should be construed broadly and is not limited to outside activities and interests that you believe may conflict with your University responsibilities.

11. 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.

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

You need to disclose talks given outside the US regardless of country if you received \$5,000 or more in aggregate from the host organization in the past year. 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 (“US-based Institutions Exception”).

13. Oftentimes, an outside entity will provide an honorarium for giving a talk and pay for my associated travel expenses and accommodations. How do I disclose this?

If the value of your honorarium and associated travel support amounts to \$5,000 or more when combined and it doesn’t meet the US-based Institutions Exception noted in FAQ 12, then this would trigger a need to disclose the activity in OAIR. For instance, if you received a \$2,000 honorarium for the talk itself and \$3,500 in reimbursements for travel and accommodations, you should disclose this activity because the combined payment/support exceeds \$5,000. To do so, you should select both the category for Professional Services or Employment and for Reimbursed Travel in the disclosure form.

Your selection of Professional Services will trigger subsequent options, from which you should select Speaking Engagement.

14. 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.

15. What information needs to be disclosed about my spouse and dependent children?

You only need to disclose the activities and interests of your spouse and dependent children that meet the definition of Significant Financial Interest (see footnote 1 above) *and* that are related to the subject matter you teach or research at the University or that may otherwise intersect with your University responsibilities. For instance, if your research is on biotechnology and your spouse is the founder and CEO of a biotech company, then you should disclose this. Or if your spouse works for a company that you are considering purchasing materials from using Harvard funds, you should disclose this.

16. What if I need to remove or otherwise correct a disclosure?

If your certification remains in “Draft” state, you may continue to revise or remove any of your disclosures prior to submission. Note that any disclosures that have been flagged for removal will be listed as “Pending Removal” until your certification is submitted. For changes to certifications which have been submitted, but still show up as in “Administrative Review,” please contact Megan or Kristen (see FAQ 8) so that a “Request for Clarification” may be initiated in the system which will then allow you to make any necessary edits. For all updates outside of a pending certification, please use the “Update Disclosures” function in the left-hand system menu.