HARVARD
UNIVERSITY POLICY

Conflict of Commitment Policy

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Responsible Office: Office of the Vice Provost for Research

Introduction

Harvard University recognizes the contributions and achievements of its faculty and other Academic Appointees both within and outside of Harvard, who all have a primary professional responsibility to support the mission of the University in areas of scholarship, teaching, and service. In addition, Harvard values the opportunities for its faculty and other Academic Appointees to have external engagements as described in the University Statement on Outside Activities of Holders of Academic Appointments, which notes: "*faculty members and other academic appointees at Harvard participate in a wide range of outside activities related to their scholarly interests. Such activities can advance the search for knowledge, bring fresh insights into Harvard classrooms, and further the University's broad interest in serving society*".

The University and its external sponsors (e.g., funders of research) have clear expectations that an individual's activities be consistent with one's primary commitment to the institution and its interests. Moreover, for those engaged in federally supported research activities it is important that an individual's total professional time commitment (e.g. teaching, research, clinical, administrative duties, and other institutional responsibilities combined) does not exceed 100 percent (e.g., 12 person months for full time appointees), whether or not salary support is requested in the application.

To clarify these expectations, and as required by Federal regulations, the University has a Conflict of Commitment Policy (the "Policy"). This Policy applies to all faculty and Academic Appointees, including research scientists, graduate students and post-doctoral fellows, who are engaged in research at, or under the auspices of, Harvard University. Permissible compensated outside activity under this policy does not relieve the obligation to obtain prior approval (as appropriate) or to disclose the activity, the associated time commitment, and any Compensation resulting from such activity under Harvard University Policy on Individual Financial Conflicts of Interest for Persons Holding Faculty and Teaching Appointments or related policies administered by any School and the Statement on Outside Activities of Holders of Academic Appointments.

Statement of Policy

This Policy affirms the Institutional Responsibilities of Academic Appointees of Harvard University to ensure that activities outside the University do not create a Conflict of Commitment that interferes with those Institutional Responsibilities. In addition, an individual's total time commitment for various University-related activities such as teaching, research, administrative duties, and clinical appointments - if applicable - must not exceed 100% (e.g. 12 person months for full time appointees). This Policy affirms the existing yearly limit of 20% of one's total professional effort that may be spent on

compensated and uncompensated Outside Activities established by the Statement on Outside Activities of Holders of Academic Appointments.

General Requirements

As articulated in the University Statement on Outside Activities of Holders of Academic Appointments, the primary professional duties of faculty are to Harvard, and outside activities cannot interfere with or detract from obligations to students, colleagues, and the University as a whole. Additionally, the following general requirements apply to the Outside Activities of Academic Appointees:

- In the conduct of their Outside Activities, Academic Appointees should not identify Harvard University or imply its endorsement by Harvard University of opinions or conclusions in public or private reports or in other ways.
- The Outside Activities must not involve more than incidental use of University property, facilities, equipment, or services.
- Academic Appointees should not list their University contact information in commercial listings or other public documents, the purpose of which is to draw attention to the individual's availability for compensatory service. Further, use of the University name, logo, and stationery for Outside Activities is prohibited.
- The Outside Activities must be consistent with policies of the Academic Appointee's college, school, or division.
- Outside Activities must comply with Policy on the Use of Harvard Names and Insignias.

Note: *When involvement in Outside Activities exceeds the 20% limit but does not substantially impair fulfillment of Institutional Responsibilities, an Academic Appointee must discuss with the relevant Dean and Administrative Official whether an appropriate adjustment in Institutional Responsibilities and Compensation is warranted, and/or steps to reduce the time committed to Outside Activities should be taken*.

Disclosure Reporting

All Academic Appointees must report their Outside Activities through the Harvard University Outside Activity and Interest Reporting (OAIR) system, or their respective School process if not using OAIR, with an estimated time commitment, and any Compensation for each activity.

Definitions

"**Academic Appointees**" means all faculty members and other academic appointees and includes all persons holding full-time (Academic-Year/3Q Appointment or full-time Twelve-Month/4Q Appointment) academic appointments at Harvard. For holders of part-time appointments, the Policy applies to activities conducted during the time for which the individual is compensated by Harvard.

- A "**Twelve-Month (or 4Q) Appointment**" is an appointment in which the individual is expected to render service to the University throughout a 12-month period, typically July 1 through June 30, as opposed to the academic year.
- An "**Academic-Year (or 3Q) Appointment**" is an appointment in which the individual is expected to render services to the University only during the academic year.

"**Administrative Official**" means the dean of the relevant Academic Appointee's school or division, or the senior official within the applicable division or school designated by the applicable dean or director as the Dean's Designee under the University's Conflict of Interest Policy for Faculty and Other Academic Appointees, or the chair of the relevant Academic Appointee's department. In the case of an Academic Appointee whose primary academic appointment is in an institute, Administrative Official includes the Director of the institute or the Director's designee.

"**Compensation**" is income, assets, or any form of equity or ownership interest, either realized or having the potential to become realized. An Outside Activity that results in Compensation to an Academic Appointee is a Compensated activity; one that does not is an "Uncompensated" activity.

"**Conflict of Commitment**" means a situation in which an Academic Appointee's Outside activities, whether Compensated or Uncompensated, interfere or have the potential to interfere with the individual Academic Appointee's Institutional Responsibilities.

"**Institutional Responsibilities**" are the professional responsibilities and obligations of an Academic Appointee to and on behalf of the University, as defined in the University's Statutes, policies of the University, any agreement or document specifying the Academic Appointee's relationship to the University, or applicable law, including, as applicable, responsibilities for (i) designing, conducting, collaborating on, and reporting research, (ii) teaching and mentoring of students, (iii) professional practice (e.g., clinical practice), (iv) service on boards and committees in any of the units that comprise the University or its affiliates, (v) administrative affairs at any level within the University (including appointments, promotions, and dealings with student affairs), and (vi) other activities that promote the activities and mission of the University. Institutional Responsibilities also include those responsibilities assigned by an Administrative Official to Academic Appointees within their department or unit. During periods of paid leave of absence, an Academic Appointee's Institutional Responsibilities include pursuing whatever activity was the basis of the Provost's approval of the leave.

"**Outside Activities**" are activities that are within or directly related to an Academic Appointee's area of professional, academic expertise, that are outside the Academic Appointee's Institutional Responsibilities, and that advance, apply or communicate that expertise through interaction with industry, the community, or the public, including through consulting or other professional opportunities.

"**University Related Activities**" are all Institutional Responsibilities and Outside Activities conducted through Harvard or through another institution (e.g., clinical responsibilities at an affiliated institution).

Contact/Responsible Office

The designated University office for implementation of this policy is the Office of the Provost, with the determination of faculty Conflict of Commitment matters delegated to the Deans.

Revision History