Harvard University Faculty of Arts & Sciences
Outside Activities and Interests Reporting Frequently Asked Questions
Last Updated May 16, 2024

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. OAIR was created to capture both financial conflicts of interest, as well as conflicts of commitment so there is one spot to enter in all information; however, because there are two separate functions being captured in one system, it can be a bit confusing when it comes to knowing what to report. This FAQ will hopefully help clarify some of those questions and create a clearer picture of what OAIR is designed to do.

1. **What should I disclose?**

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.

Examples of outside activities to be disclosed in OAIR include:

- Equity interests in publicly traded companies
- Employment and consulting agreements with entities other than Harvard that are unpaid or paid per year and have a time commitment.
- Appointments at or ongoing affiliations with entities other than Harvard that are unpaid or paid per year and have a time commitment unless these activities are expressly excluded elsewhere in this guidance.
- Executive roles that are unpaid or paid per year and have a time commitment.

Financial Conflicts of Interest (typically a $5K threshold) + Conflicts of Commitment ($0 threshold) = Outside Activities and Interests Reporting (OAIR)
- Teaching courses or substantial portions of courses outside of Harvard (aside from joint programs) that are unpaid or paid per year.
- Media appearances and expert testimonies that are unpaid or paid per year.
- Participation in foreign talent recruitment or development programs that are unpaid or paid 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 – 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.
- Income from books and other publications, whether hard copy or electronic.

2. 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.

3. When do I need to submit a disclosure?

You are required to submit a disclosure on an annual basis and disclosure updates within 30 days of acquiring a new significant financial interest (see graphic). 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.

4. 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 previous disclosure date.

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

You can contact the RCP_outsideactivities@harvard.edu email account with questions about disclosure requirements and procedures. You can contact the oairhelp@harvard.edu email account with technical questions about the OAIR system. Please do not reply directly to the system-generated email as you will not receive a response.
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 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.

8. **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. 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 altogether1 (“US-based Institutions Exception”).

9. **I have attended an academic conference to deliver a paper or a talk. Is that an “outside professional activity” since it took place away from Harvard?**

No, academic conferences are generally considered to be within the professional responsibilities of a member of the Harvard faculty; however, if the conference was held overseas, you should disclose.

10. **I serve as a peer reviewer for academic journals in my field. Is that an “outside activity”?**

No, reviewing papers submitted for publications in journals in your field is part of the service to the academic community that constitutes a core part of a faculty member’s job. You *may* list these activities if you would like your Faculty Affairs office to be informed of your engagement and productivity, but it is not an outside activity that must be disclosed unless you were to receive financial compensation in the amount of over $5,000, triggering a potential FCOI.

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1 “US-based Institutions Exception” applies to travel that is reimbursed or sponsored by Harvard or the following entities: an Institution of higher education as defined at 20 U.S.C. 1001(a); an academic teaching hospital; a medical center, or a research institute that is affiliated with an Institution of higher education.
11. What if I do not know the exact value of my financial interest, or the exact amount I was (or will be) paid for a particular engagement, including travel expenses paid by a third party?

If you have an interest to report but do not have a precise dollar value at the time that you are disclosing it, make the best estimate you can. For travel, estimated amounts can be found on travel planning web sites.

12. Do I have to disclose every single payment of royalties even though the amounts are nominal?

No, you do not have to list individual small payments; you may provide a grand total. You also can estimate the grand total. However, if you have a significant payment(s) which is/are not in line with typical textbook royalties, we ask that you note that/them separately.
**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.

**Conflict of Commitment** includes:

- “Conflict of Commitment” means a situation in which an Academic Appointee’s Outside, whether Compensated or Uncompensated, interfere or have the potential to interfere with the individual Academic Appointee’s Institutional Responsibilities.