

# What to Include

Harvard University is committed to upholding its core mission and values, including the assurance of personal and institutional academic integrity in conducting all academic duties. Among these assurances is the need to identify and appropriately manage potential financial conflicts of interest and conflicts of commitment. As such, it is important for Faculty to disclose all significant financial interests and external professional commitments, as described in the *"Harvard University Policy on Individual Financial Conflicts Of Interest For Persons Holding Faculty And Teaching Appointments"* (the FCOI Policy) and *"Statement on Outside Activities of Holders of Academic Appointments"* (the Outside Activities Statement).

Pursuant to Section E of the FCOI Policy linked above, you are required to disclose the following types of activities and interests held over the past 12 months:

1. **Outside Professional Activities**, both paid and unpaid, that are related to your Harvard responsibilities but that you perform in your personal capacity and not as Harvard employee, and
2. **Financial Interests** held by you, your spouse, or dependent children in outside entities that are focused in areas related to your Harvard responsibilities.

If you have any questions about what constitutes an outside activity and which activities would be considered part of your institutional responsibilities at Harvard, please reach out to your School's Conflict of Interest Administrator ([link](#)).

## Examples:

### 1. Related financial interests, equity holdings and ownership

All financial interests, equity holdings, ownership, and fiduciary relationships held by you or your family that relate to your institutional responsibilities, regardless of the associated dollar amount of the interest or whether the value can be readily determined. If you do not have the exact value readily at hand, a best estimate (within \$5,000) will suffice. Examples include:

- Equity or other ownership Interests, including any shares of stock, options, warrants, private equity, or promises of such, or venture or other capital financing, etc., whether the company is privately or publicly held and regardless of whether the equity currently has any value. This does not include diversified financial holdings or investments not directly controlled by you.
- Potential income related to inventorship/authorship on intellectual property that is licensed to an outside entity (including but not limited to inventions, copyrighted works, and/or trademarks) regardless of whether royalties have been received.

### 2. Executive roles and fiduciary responsibilities

- Any paid or unpaid fiduciary or management role as an officer, director, or member of a governing board (e.g., board of directors or the equivalent) in a relevant outside entity held by you or your immediate family member

### 3. Relationships that constitute outside professional activities

All outside professional activities that are related to your institutional responsibilities, including activities for which you do not receive compensation, such as:

- Professional services or employment, including any:
  - Appointment or employment agreement with any outside entity, foreign or domestic
  - Private consulting
  - Membership on a scientific or other advisory board
  - Teaching a program outside of Harvard
  - Office held in a professional organization
  - Services provided to a non-US government (including testimony)
  - Participation in a Foreign Talent Recruitment Program (FTRP)
  - Paid media appearances
  - Expert witness testimony
  - Editorial services
  - Outside activities specific to Architecture, Landscape Architecture and Planning, including:
    - Fellowship and artists' residencies (other than under an award through Harvard)
    - Exhibitions, design projects, professional juries (including design juries)
- Conducting research or otherwise being listed on a sponsored award on behalf of a program outside of Harvard
- Prizes, including awards and honoraria
- Certain speaking engagements and travel support or reimbursements, including travel paid on your behalf by a third party.
  - *To be disclosed*::
    - Honoraria and travel support provided by foreign entities (academic and non-academic)
    - Honoraria and travel reimbursements from for-profit entities in the US
    - Honoraria and travel reimbursements from US non-profits (**exceptions are US federal, state, or local government entities or US-based institutions of higher education and affiliated medical centers – they don't need to be disclosed**)

Payments from any corporate entity that pass through an intermediary should be attributed to the primary source. For example, if a pharmaceutical company hires a public relations firm to arrange seminars in support of the company's product, the payments should be attributed to the pharmaceutical company, not the PR firm, regardless of which company's name appears on the check you receive (or anticipate receiving).

## Exclusions:

- Activities in which you engage as part of your Harvard institutional responsibilities, including teaching, sponsored research, and other academic and research programs managed through Harvard or an affiliated institution, and peer review of manuscripts or proposals in your academic field
- Income from investment vehicles, such as mutual funds and retirement accounts, as long as you do not directly control the investment decisions made in these vehicles
- Income from seminars, lectures, or teaching engagements sponsored by:
  - Federal, state, or local government agency located in the United States
  - United States Institution of higher education, or an academic teaching hospital, medical center, or research institute affiliated with an institution of higher education
- Income from service on advisory committees or review panels for:
  - Federal, state, or local government agency located in the United States
  - United States institution of higher education, or an academic teaching hospital, medical center, or research institute affiliated with an institution of higher education

Because the required elements of certification include paid and unpaid activities, and to reduce the need for duplicate reporting, some schools may use the outside professional activities contained in these reports in their internal faculty review processes. Information contained in these reports will be treated on a need to know basis.

If you have any questions about what needs to be included, keep in mind the following:

- Include any relationship that relies upon the experiences and professional expertise that serve as the basis for your faculty appointment and/or role at this institution.
- In determining relatedness to your institutional responsibilities, faculty and researchers should apply a standard of common sense -- include interests that you would reasonably expect your peers to disclose and when in doubt, disclose.
  - Please note that the Schools can vary on their consideration of outside activities as part of their institutional missions or as external to them. If after reviewing these guidelines and examples you are unsure about an activity, please contact your School's COI administrator before proceeding with a submission. It is helpful for both disclosers and COI staff to communicate early in the process to save time and effort by focusing on only relevant disclosures.
- Finally, these reporting requirements are independent of whether your activities or financial interests represent a potential, perceived, or actual conflict of interest.

If you have any questions, please reach out to your [School's COI administrator](#).

Please note that the Outside Activities Statement requires additional disclosures and approvals for those professional relationships closest to the core of your Harvard obligations, such as teaching or conducting research at another institution or entity. While any such relationship should be disclosed as a related outside professional activity, this

requirement is distinct from your obligations under the Outside Activities Statement, including with respect to obtaining School-level approval prior to entering into any such outside teaching and research engagements.