

## HARVARD UNIVERSITY GOVERNMENT-, FOUNDATION-, AND INDUSTRY- SPONSORED ACTIVITY FINANCIAL DISCLOSURE PROCESS

One of our most valuable assets at Harvard University is the integrity of our research and academic programs, many of which are made possible because of sponsored awards from the government, industry, and private foundations. **Investigators** conducting University research, who are entrusted with stewardship of these awards, are expected to perform their work with due regard for issues of conflict of interest and conflict of commitment.

By establishing a uniform disclosure mechanism as part of the review of all awards – whether from the government, industry, private foundations, or individuals – the University endeavors to ensure that potential conflicts arising in connection with sponsored activities are eliminated or appropriately managed, and that there are consistent disclosure standards for all **Investigators** conducting University research. Moreover, this process meets the federal requirements for disclosure of significant financial interests in connection with Public Health Service and National Science Foundation grants (42 CFR Part 50 Subpart F, 45 CFR Part 94, and 60 Fed. Reg. 35820).

Individual Schools and the central administration have existing policies designed to identify potential conflicts of interest and conflicts of commitment. This new disclosure process does not replace those policies, but will be integrated with them to maintain consistency. In addition to the requirements of this policy, **Investigators**, including key personnel, on all awards, regardless of funding source, will remain responsible for complying with the applicable rules of all Schools in which they hold appointments, including each School's rules regarding conflict of interest and conflict of commitment.

There are two forms associated with the disclosure process described below: a *Disclosure Summary* and a *Detailed Disclosure Statement*.

The *Disclosure Summary* must be completed by all **Investigators** on the award, including all key personnel, at the time of proposal submission as well as by any **Investigators** who join the project after the proposal has been submitted. The **Principal Investigator** must ensure that completed forms have been submitted by other **Investigators** on the project. *Disclosure Summaries* will accompany the proposal submitted to the Office for Sponsored Research or Sponsored Programs Administration. **It is the responsibility of all individuals completing a *Disclosure Summary* to submit a new form should relevant circumstances change.**

When required, as specified on the *Disclosure Summary*, *Detailed Disclosure Statements* will be returned to the office designated by the Dean for each School.\* The *Detailed Disclosure Statements* will be reviewed in the first instance by the School administering the sponsored award, in accordance with its policies. If for some reason a potential conflict cannot be resolved by the School, it will be referred for resolution to a University-wide committee, comprised of faculty and administrators. The University-

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\* **Investigators** affiliated with more than one School, or involved on an award not administered by the School with which they are primarily affiliated, should return the form to the designated office for the School through which the award will be administered. That office will consult with the relevant School(s) to determine whether the Investigator is in compliance with the policies of the relevant Schools, including the School through which the award is administered.

wide committee may seek the advice of the Office of the General Counsel to assist it in addressing the potential conflict.

The University-wide committee will annually receive certifications from the Schools that: (i) all *Disclosure Summaries* and *Detailed Disclosure Statements* relating to proposals for sponsored programs administered through the University have been received and reviewed; and (ii) all potential conflicts that could not be addressed through a School's policies were referred for resolution to the University-wide committee. The University-wide committee, in conjunction with Risk Management and Audit Services, may periodically conduct spot checks of the disclosure process to evaluate the effectiveness of the system and compliance with its terms.

Whenever **Investigators** have *any* doubts about whether a **Financial Interest** should be reported, they should consult with the appropriate official at the office designated for their School.

## DEFINITIONS

**Investigator** means the award recipient(s), principal investigator(s) or co-principal investigator(s), and any other person responsible for the design, conduct, or reporting of the supported activities. This will include "key personnel" identified on any proposal relating to an award, as well as scholars and colleagues who are called upon to contribute significantly to the research that is the subject of the grant. If an **Investigator** at another institution is involved in Harvard-based research through a formal subcontracting agreement, the terms of the subcontract will ordinarily assign primary responsibility for addressing potential conflicts of interest or conflicts of commitment to the investigator's home institution, and he or she need not additionally complete this *Disclosure Summary*. If the subcontract does not assign responsibility to the home institution, or if there is no subcontract agreement, then personnel from other institutions who meet the above definition of **Investigator** must complete the *Disclosure Summary* (and *Detailed Disclosure Statement* if required) and forward the document(s) to the designated office(s). Except in unusual circumstances, the term Investigator does not include staff who conduct purely administrative tasks relating to the project (sponsored programs office staff, financial office staff, etc.).

**Principal Investigator** means the individual(s) designated by the University as responsible for the scientific or technical direction of the project.

**Financial Interest** means an interest in an **Entity** consisting of: (i) equity interests, including stocks, stock options, bonds, or similar ownership interests; or (ii) receipt of, or the right or expectation to receive, any income from such **Entity** (or from an agent or other representative of such **Entity**), whether in the form of a fee (e.g., consulting), salary, allowance, forbearance, forgiveness, interest in real or personal property, dividend, royalty or fees derived from the licensing of technology, rent, capital gain, stock or stock options, or any other form of compensation; or (iii) receipt of, or the right or expectation to receive, from Harvard or another institution a share of revenue resulting from a license to such Entity. The term "**Financial Interest**" does not include salary and other remuneration (except as specified in (iii) above) from Harvard University or its affiliated hospitals, or interests in mutual, pension, or other institutional investment funds over which the Investigator does not exercise control.

**Family Member** means a spouse, domestic partner, or dependent child, or a person who lives in the same household as you and is your parent, sibling, or other relative.

**Entity** means any legal body created for profit or charitable purposes as well as any individual.