

HARVARD UNIVERSITY
FINANCIAL INTERESTS ONLINE DISCLOSURE FORM
Definition of Key Terms

Equity

“Equity” means stock, stock options, warrants or other ownership interest. You are not required to disclose equity held in diversified financial holdings such as mutual funds.

Family Member

“Family member” means spouse and dependent children. So far as the financial interests of family members bear upon the application of the University policy on financial conflicts of interest, a faculty member must affirmatively make inquiry into, and shall be presumed to know of, the financial interests of family members as herein defined.

Fiduciary or Management Role

“Fiduciary or management role” means service as an officer, director or service on an advisory board (including scientific advisory boards), whether paid or unpaid. Investigators may need prior approval from the Dean before assuming such responsibilities. “Fiduciary or management role” does not mean service on an editorial board. In their implementation plans, schools may extend this requirement to include service on the board or advisory panel of a not for profit entity.

Institutional Responsibilities

“Institutional responsibilities” means an individual’s professional responsibilities on behalf of Harvard. Such responsibilities include, but are not limited to: research, research consultation, teaching, professional practice, institutional committee memberships, and service on committees or panels such as research ethics committees (e.g. Institutional Review Boards, Institutional Animal Care and Use Committees) and other bodies monitoring the conduct of research.

Internal Confidential Disclosure

“Internal confidential disclosure” as opposed to *public disclosure*, means the provision by individuals of information about their outside financial interests related to their institutional responsibilities *internally* to institutional officials and bodies designated in their school’s implementation plan.

Investigator

“Investigator” means the project director or principal Investigator and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of research¹.

¹ “Investigator” for purposes of compliance with the conflict of interest regulations of the Public Health Services is broader than the class of faculty and holders of teaching appointments under the University policy. For PHS purposes, “investigator” is “the Project Director/Principal Investigator and any other person,

Related Outside Entity

School Implementation Plans may define “related outside entity” beyond the definition provided below. You should consult your school’s Plan carefully.

“Related outside entity” means an entity in which a person has a significant financial interest that may, or may reasonably appear to an outside observer, to influence the discharge of teaching, research, or other University-related responsibilities. In determining relatedness, individuals should employ a standard of common sense, and when in doubt, disclose. Examples of entities that might be related are those:

(1) whose products, services or activities are related to the areas of a faculty member’s or an investigator’s teaching or research;

(2) that fund research in a faculty member’s or an investigator’s area of academic interest;

(3) that own or have rights to develop intellectual property that is the subject of research in which a faculty member or an investigator participates; (4) that compete commercially with such an entity as described in (3);

(5) that make or propose to make a gift to the University that would support a faculty member’s or an investigator’s teaching or research activities;

(6) that furnish products or services to the University through a contractual process in which a faculty member or an investigator participates in any way;

(7) that propose to enter a licensing agreement with the University with respect to technology invented by the faculty member or investigator;

(8) that act as a legal or *de facto* agent for any outside entity engaged in any of the above activities.

Significant Financial Interest

School Implementation Plans may define “significant financial interest” beyond the definition provided below. You should consult your school’s Plan carefully.

“Significant Financial Interest” includes, but is not limited to, (1) financial compensation, including travel, from consulting, employment, managerial, and fiduciary relationships that, when aggregated over the preceding twelve months, exceed \$5,000; (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, for-profit, entity; and (4) intellectual property rights and interests (e.g. patents, copyrights), upon receipt of income related to such rights and interests. “Financial compensation” does not include,

regardless of title or position, who is responsible for the design, conduct, or reporting of research funded by the PHS, or proposed for such funding, including persons who are subgrantees, contractors, collaborators, or consultants. “ Therefore, in order to comply with PHS regulations, it may be necessary, in specific grants, for post-doctoral candidates, fellows and even graduate students, to complete internal disclosures under the University policy. See 42 C.F.R. 50.602 (definition of “investigator”).

for example, interests of any amount in diversified financial holdings, or royalties or other remuneration paid by Harvard.

Students

“Students” means students, trainees, and post-doctoral fellows.