

Outside Activity and Interest Reporting (OAIR) Project

SUMMARY OF CHANGES | DECEMBER 2020

Background

Convened in late 2019, the Outside Activity and Interest Reporting Workgroup was formed as an extension of the Research Administration and Compliance Portal Project to support the planning, design, and deployment of a new Outside Activities and Interests Reporting (“OAIR”) platform, consolidating financial conflict of interest (“fCOI”) and outside activities reporting across the University. This effort has driven updates to the Harvard University Policy on Financial Conflicts of Interest, updates to reporting processes on how and what to include, along with the deployment of the new OAIR application. Each of the changes outlined below have the full support of leadership and serve as a means to support shifting perspectives on best practices related to increased federal scrutiny of potential foreign influence on research, as well as investigator conflict of interest and commitment.

Policy Updates

Clarifications and core policy changes were proposed by the OAIR workgroup and the following key updates will be incorporated into official University wide Policy. Two key changes:

<i>Policy Change / Clarification</i>	<i>Impact</i>
1) Zero Dollar Threshold - The disclosing population as defined at each school will be required to report: all relevant relationships with outside entities, regardless of the associated dollar amount of the financial interest.	<ul style="list-style-type: none">• The University Policy on Financial Conflicts of Interest is currently being updated to reflect this adjustment.• All schools will follow this new requirement, though there will be an exception process for HBS and HLS.
2) Reporting Lookback –Reports should include information from the last 12 months or since last disclosure (whichever is longer).	<ul style="list-style-type: none">• Current University Policy includes this requirement.• Schools are choosing locally appropriate annual reporting periods and messaging appropriate to the school community to further align with this requirement.

Process Updates

Considering the scope of the OAIR project and seeking to standardize “What to include” in a report across schools, the new process itself is not drastically different than it is today. Three key changes:

<i>Process Change / Clarification</i>	<i>Impact</i>
1) Reporting Scope - All relevant outside activities will be reported in OAIR going forward.	<ul style="list-style-type: none">• For most schools, Faculty Affairs-based activity reporting will initiate at the same time as the OAIR process to simplify reporting for faculty.• Features of integration with Faculty Affairs allow for single entry of outside activities.
2) Notifications - New system-generated notifications will support the reporting process.	<ul style="list-style-type: none">• Personalized links, information, and reminders send direct to faculty and affected staff.• Schools will supplement system notices with separate messaging.
3) Research-Based Certifications - The requirement for research-based reporting will shift to requiring a <u>report on file at proposal</u> , followed by <u>an active update and attestation at award</u> .	<ul style="list-style-type: none">• Reduction of multiple reports for a single project.• Elimination of additional entries and reviews.

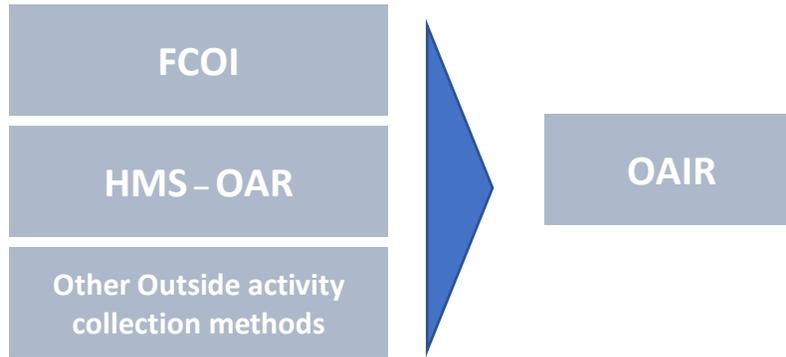
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System Changes

The new Outside Activity and Interest Reporting application will replace several legacy applications to become the system of record for the following two types of information for applicable faculty and research investigators:

- Relevant equity holdings, ownership, and fiduciary relationships; and
- Relationships that constitute outside professional activities



Use of OAIR

A brief overview of new OAIR application and processes use.

Which Schools will be using the new OAIR system?	<ul style="list-style-type: none"> • FAS, GSE, GSD, HDS, HKS, HMS, HSPH, Wyss • HLS and HBS will not use OAIR and will continue to use own (non-OAIR) systems as they do today
Who must report in OAIR?	<ul style="list-style-type: none"> • Faculty and individuals with a .5 or greater Harvard appointment • Individuals marked as investigator* on awards subject to U.S. Public Health Service (“PHS+”) requirements** <p><i>* Investigator - those responsible for the design, conduct or reporting on a research project</i> <i>** HMS and Wyss will continue to extend the PHS+ requirements to all sponsored awards</i></p>
When is reporting in OAIR required?	<ul style="list-style-type: none"> • Annually during each school’s reporting period • Updates within 30 days of new or updated relationships throughout the year • For all awards subject to “PHS+” requirements <ul style="list-style-type: none"> ○ At proposal if no report on file during the previous 12 months ○ At award

What to expect at OAIR launch

During the week prior to launch starting on January 15th, 2021 the existing Harvard systems will go offline so the HUIT team can complete the technical transition to OAIR. There will be processes in place at each school to handle any reporting needs during this time. **Beginning January 25th, 2021:**

- Report new or revised relevant outside professional activities and interests in the OAIR system.
- Investigators may receive system notices to take time-sensitive action in OAIR when policy requires. These will primarily be tied to research-based reporting requirements tied to the award process.
- During the first six months of 2021 each school will kick off their own annual reporting period. At this time required faculty will receive a separate email followed by a system notice to complete their annual certification.