

## **REVIEW PROCESS FOR DIVISION OF MEDICAL SCIENCES DOCTORAL STUDENT OUTSIDE PROFESSIONAL ACTIVITY REQUESTS (other than internships)**

### **I. Purpose of the Doctoral Program Outside Activity Review Process:**

Major priorities of the Division of Medical Science are to support students so they can achieve their personal educational goals and to guide them towards a successful completion of their graduate program. This document is intended to promote transparency between PhD students and their graduate programs regarding a student's engagement in outside professional activities that are relevant to the student's responsibilities and obligations to GSAS and HMS, and to ensure that any such outside activities do not interfere with the successful and timely completion of their degree.

Harvard Graduate School of Arts and Sciences (GSAS) and Harvard Medical School (HMS) know that PhD students in the Division of Medical Sciences may want to engage in paid and unpaid outside professional activities while completing their degree. These types of activities can provide valuable and unique hands-on experience and networking opportunities that enhance a student's overall educational experience. Nonetheless, it is expected that students will arrange their outside professional activities to ensure their obligations to their full-time graduate program are prioritized, financial conflicts of interest are avoided, and all applicable School policies, sponsor requirements and research regulations are followed.

Therefore PhD students are required to report such activities to their program leadership and for program leadership to identify, manage or eliminate financial conflicts of interest, conflicts of commitment, or any other compliance concerns that may arise under applicable GSAS and/or HMS policies or regulations.

### **II. Institutional Policies & Guidelines**

There are several institutional policies and guidelines governing PhD student interactions with outside entities, including University policies pertaining to conflicts of interest and commitment, intellectual property ownership and management, ethical conduct of research, and data retention and management.<sup>1</sup> The limitations on the type and nature of relationships that doctoral students are permitted to have with outside entities include but are not limited to:

- Current students may not serve in executive positions that make the student materially responsible for the day-to-day operations of any outside entity. Special scrutiny is also given to fiduciary director positions. In particular, students should not serve in any

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<sup>1</sup> Signed Participation Agreements are required for individuals conducting research through Harvard to confirm compliance with these policies.

managerial or director position at entities that license their Harvard advisor's technology.

- University resources (for example: non-public data, lab equipment, supplies or reagents, animals, O2 clusters, Harvard library or software subscriptions and Harvard email accounts, etc) may not be used for outside activities.
- Students generally should not enter into outside commercial relationships with their faculty mentors. Exceptions may be granted on a case-by-case basis by the Office for Academic and Research Integrity in consultation with the Office for the Vice Provost for Research.

### **III. Framework for Reporting, Review, and Approval**

#### **A. Reporting**

Each full-time Ph.D. student enrolled in a DMS doctorate program will be expected to report to their program leadership all new proposals for consulting or other employment relationships with outside entities engaged in commercial or research activities relevant to the student's DMS responsibilities and obligations<sup>2</sup> *prior to* engaging in any such activities (see form below). Incoming students with pre-existing relationships with outside entities must report these relationships within six months of matriculation so they can be reviewed, and students with pre-existing relationships with outside entities must report these relationships within six months of implementation of this policy. This policy does not include case competitions, or volunteer activities for non-profit charitable organizations.

#### **B. Review Process**

The Graduate Education Outside Activity Advisory Committee ("Advisory Committee") consists of faculty, representatives from the Office for Academic and Research Integrity, and relevant department administrative leadership. These individuals will review the proposed engagement, advise the student on the risks associated with it, and reach a judgment as to whether, and under what conditions, the student may engage in the proposed activity. Students may be prohibited from simultaneously engaging in the proposed activity while continuing to participate in their PhD program if, in the reasonable judgment of the Advisory Committee, the engagement presents an unmanageable conflict of interest, unduly limits their ability to fully participate in the doctorate program or otherwise overlaps significantly with their responsibilities to the program or their laboratory within the program.

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<sup>2</sup> This includes any engagement with an outside entity (*any entity other than Harvard University, including Harvard Medical School and the institutions formally affiliated with Harvard Medical School*) that relies upon the experiences and professional expertise that a student acquires as part of the DMS doctorate program, but that is conducted and/or contracted for in the student's personal capacity and is not part of the DMS Program or any other institutionally supported program in which the student participates as a member of the community (e.g., Harvard case competitions, etc).

Factors that will be considered by the Committee and guidelines students should be aware of include but are not limited to:

- The potential that the proposed outside activity and the student's financial interest in the entity could either: 1) directly and significantly affect the design, conduct or reporting of the student's research; or 2) increase the risk of the student prioritizing either the outside entity's interests or their mentor's outside business relationships over school/program interests.
- The potential that the types of projects the student will be working on for the outside entity, or the outside entity's research and business activities as a whole, could overlap with the student's Harvard research and/or the non-public information to which the student may have access through the student's Harvard role (i.e., how similar is the outside company's work to Harvard's work?).
- Whether the company has licensed intellectual property, exclusively or non-exclusively, from Harvard.
- The status of the student's relevant Harvard research projects, i.e., is bench work completed (student completing manuscripts) or are experiments still being conducted?
- Whether there are unique circumstances that align the student's proposed outside activity with the academic and professional goals of the student and their Harvard graduate program; e.g. Will this provide training for future career goals that is not otherwise available through the school/program?
- Time commitment and duration of engagement. Engagements of an indefinite duration and/or that commit significant time of the student to outside work will be discouraged or disallowed. Subject to the limits set forth in the next paragraph, the Advisory Committee may exercise reasonable discretion to accommodate discrete, short term engagements of a higher commitment. The Advisory Committee's evaluation of a proposed time commitment will be fact specific and in full consideration of the student's active responsibilities to degree requirements (i.e., year in program, status of ongoing projects, whether the individual is making satisfactory progress to degree).
- Whether that the student's outside company work could interfere with the student's ability to fully participate in lab activities or other program activities (journal club, lab meetings, etc.). The GSAS Policies state that full-time GSAS students "may not undertake any position of employment outside their graduate studies that obligates them to more than 17 hours of work per week." <https://gsas.harvard.edu/financial-aid/regulations-regarding-employment>. Generally, the HMS Graduate Programs have set 10 hours per week as the maximum time commitment for sustained (>3 months) part time work.<sup>3</sup>

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<sup>3</sup> If the student is supported through federal funding, i.e., NIH training grant, students are required to limit part time research, teaching, or clinical employment to no more than 25% of their time (10 hours/week).

- Whether the student's financial aid and sponsored funding sources have any policies that would conflict with the outside professional activity under consideration.
- Special attention and consideration will be paid to whether the student's mentor/principal investigator or other members of the lab have a relationship with the company as this may create the potential for undue influence on the student or create tensions with other members of the lab.
- It should be the expectation of students that the student's advisor will be informed of any proposed outside activity that the Advisory Committee decides is relevant to the student's research obligations and/or could impact the student's available time commitment to their advisor's laboratory. Proposed compensation will not be shared with an advisor. While the Advisory Committee will consider in good faith any request from a student that an advisor not be made aware of a proposed engagement if the student believes such notification would pose a conflict of interest, the final decision of notifying an advisor will rest with the Advisory Committee in consultation with Academic and Research Integrity and there should be a general expectation by students of transparency.
- Other factors that may be considered include, but are not limited to immigration status, union contract, and funding requirements of the student.

### **C. Approval**

The Committee Decision will be communicated to the student and the program leadership. The program will communicate directly with the student regarding the outcome of the Committee's review, any concerns raised and/or conditions imposed for approval. The student will be expected to notify the program of any significant changes to an outside activity that may impact the scope of student's engagement, time commitment and/or the nature of the Committee's review (e.g., acquisition of equity, change in project, change in title etc.).

### **IV. COI Office review:**

If the student's proposed outside activity is approved, then additional review by the Outside Activities team in Academic and Research Integrity may be needed in order to determine whether any additional conflict of interest management measures may be needed in view of sponsor requirements for the student's research projects.

### **V. Training activities prior to outside work.**

Consulting or training modules (online) must be completed before starting outside work.

### **VI. Ramifications for not reporting**

The GSAS Policies require students to “receive approval from their department and advisor prior to taking any amount of employment outside of their graduate studies.”  
<https://gsas.harvard.edu/financial-aid/regulations-regarding-employment> If a student fails to report on outside professional activities relevant to their obligations to their doctorate program (e.g., any research or scientific consulting) or to complete the training module, this information may be reported to the GSAS Administrative Board and may result in disciplinary action.

**Applicable Policies**

[Graduate School of Arts and Sciences Policies](#)

[Harvard University Policy on Individual Financial Conflicts of Interest for Persons Holding Faculty and Teaching Appointments](#)

[Statement of Policy in Regard to Intellectual Property](#)