

**Harvard Pilgrim Health Care, Inc.**  
**Harvard Pilgrim Health Care Institute, LLC**  
*Office of Sponsored Programs*

**Policy and Procedure**

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**TITLE: Request for Approval to Participate in External Activities**

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**PURPOSE:**

To provide investigators with guidelines concerning their participation in external consulting or other activities.

**PERSONS AFFECTED:**

This policy & procedure (P/P) applies to all Harvard Pilgrim Health Care, Inc. (“HPHC”) and Harvard Pilgrim Care Institute, LLC (“HPHCI”) (collectively, “HPHC/I”) personnel engaged in research, teaching or research administration activities in support of the charitable and educational mission of HPHC, Inc.

**POLICY:**

Full-time faculty may devote one day a week to outside consulting and other external activities. Research scientists may also request approval to participate in external activities. Prior to participating in the activity, any faculty and research scientist (collectively, “Requester”) must ensure that the activity doesn't create a financial conflict of interest (see the **HPHCI Financial Conflicts of Interest of Researchers and Research Staff Policy & Procedure**). External activities are permitted provided the Requester’s obligations to HPHC/I are met and the Requester must not have outside managerial responsibilities and may not have titles that include terms such as: executive, officer, director, manager, or chief.

**DEFINITIONS** (see **GLOSSARY** for meaning of the terms listed below):

**Consulting:**

In general, consulting is defined as professional activity related to the person's field or discipline, where a fee-for-service or equivalent relationship with a third party exists.

**Conflict of Interest:**

A conflict of interest occurs when there is a divergence between an individual's private interests and his or her professional obligations to HPHC/I such that an independent observer might reasonably question whether the individual's professional actions or decisions are determined by considerations of personal financial gain.

**Honorarium:**

A payment made in recognition of acts or professional services for which custom or propriety forbids a price to be set.

**PROCEDURE:**

The Requester must discuss the situation with their grants manager to determine whether the activity is an external activity. If the grants manager and the Requester determine that the activity is an external activity, the Requester must complete the **Request for Approval to Participate in External Activities** Form. The Requester must also certify on the **Request for Approval to Participate in External Activities Confirmation** Form that the external activity will not be performed on HPHC premises, use HPHC/I data, staff, or other resources, will not be represented as being endorsed by HPHC/I and that they are not functioning as a principal investigator on a research project.

All consulting agreements must be disclosed to and approved by the HPHCI Executive Director and the DPM Chair in advance of commencing any work. HPHCI will not be a party to a consulting or non-disclosure agreement, and the Requester must file a Financial Conflict of Interest (FCOI) disclosure through Click Commerce.

Requesters who wish to have their external activity fees and honorarium deposited in their HPHCI General Purpose Account may do so, with the understanding that this money is considered to be a gift to HPHCI. A personal check from the Requester must be accompanied by the **Request for Approval to Participate in External Activities** Form as evidence of approval or by other evidence that the payment is an honorarium. A receipt of donation will be furnished.

**REVISION HISTORY:**

<b>Department:</b> OSP	<b>Title:</b> Request for Approval to Participate in External Activities
<b>Effective Date</b>	<b>Owner:</b> Director, Office of Sponsored Programs
<b>Reviewed By/On:</b> Charlotte Johnson, Amy Hudspeth Cabell/September 23, 2020	
<b>Replaces P/P Dated:</b> March, 2016; December, 6, 2018; August 1, 2020	
<b>Related Documents:</b> Policy & Procedure Time & Effort; Policy & Procedure Model Consultant Agreement; Policy & Procedure Cost Transfer Policy; Policy & Procedure Cost Sharing; Financial Conflicts of Interest of Researchers and Research Staff Policy & Procedure; Request for Approval to Participate in External Activities Confirmation Form; and Request for Approval to Participate in External Activities Form.	
<b>References:</b>	
<b>Approved By:</b> Charlotte A. Johnson, Dir., OSP	