

Harvard Pilgrim Health Care Institute

Policy and Procedure

External Activities

This policy applies to all Harvard Pilgrim Care Institute (HPHCI) faculty.

Definitions

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/HPHCI 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.

Activities Not Covered under this policy

Service to national commissions, governmental agencies and boards, granting agency peer review panels, philanthropic organizations or charities, professional societies, visiting committees or advisory groups to other universities, and analogous bodies, not considered consulting.

Scholarly communications in the form of books, movies, television productions, art works, etc., though frequently earning financial profit for a faculty member and/or for another party (e.g., publisher), not considered consulting.

Background

It is understood HPHCI faculty engage in consulting activities. The principle is that, in consulting, a person agrees to use his or her professional capabilities to benefit the interest of a third party, in return for an immediate or prospective gain.

Policy

Full-time faculty may devote one day a week to outside consulting activities. Prior to committing to the activity, faculty must ensure that the activity doesn't create a conflict of interest (see the Conflict of Interest Policy) and take into account the consequences of the MA Pharmaceutical and Device Disclosure Requirements. Consulting activities are permitted provided the faculty members' obligations to HPHC/HPHCI are met and faculty must not have outside managerial responsibilities and may not have titles that include terms such as executive, officer, director, manager, or chief.

The investigator must discuss the situation with his/her grants manager and certify in writing that the work will not be done on HPHC premises, use HPHC/HPHCI data, staff or other resources, the study will not be represented as being endorsed by HPHC/HPHCI and that he/she is not functioning as a principal investigator on the project.

All consulting arrangements must be disclosed to the HPHCI Executive Director in advance of commencing work and all consulting agreements must be approved by the HPHCI Administrative Director. However, HPHCI will not be a party to a consulting or non-disclosure agreement.

Faculty who wish to have their consultancy 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 faculty must be accompanied by evidence of approval by OSP, HPHCI Executive Director and HPHCI Administrative Director or by evidence that the payment is an honorarium. A receipt of donation will be furnished

Related Resources

Policy & Procedure Time & Effort Policy & Procedure
Model Consultant Agreement
Policy & Procedure Cost Transfer Policy
Policy & Procedure Cost Sharing Policy
Policy & Procedure Conflict of Interest
Mass Pharmacy & Device Disclosure