



**Harvard Pilgrim Health Care, Inc.  
Harvard Pilgrim Health Care Institute  
*Office of Sponsored Programs*  
Policy and Procedure**

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**TITLE: External Activities**

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**PURPOSE:**

**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 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.

**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/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.

**PROCEDURE:**

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.

**REVISION HISTORY:**

<b>Department:</b> OSP	<b>Title:</b> External Consultancy
<b>Effective Date:</b> March, 2016	<b>Owner:</b> Director, Office of Sponsored Programs
<b>Reviewed By/On:</b> December 6, 2018	
<b>Replaces P/P Dated:</b>	
<b>Related Documents:</b> Policy & Procedure Time & Effort; Policy & Procedure Model Consultant Agreement; Policy & Procedure Cost Transfer Policy; Policy & Procedure Cost Sharing; Policy & Procedure Conflict of Interest Mass Pharmacy & Device Disclosure	
<b>References:</b>	
<b>Approved By:</b> Charlotte A. Johnson, Dir., OSP	