



Guidance on Outside Activities During Kempner Fellowship

Summary:

Kempner fellows are highly capable researchers who collaborate with a broad community to advance their research. Collaboration — where each party pursues its own research agenda and is responsible for its own work — is generally encouraged and not addressed here.

However, research fellows may be asked to or may wish to engage in paid or unpaid research or other activities with external parties. The following guidelines address participation in these outside activities.

Please note that there are significant considerations, limitations, and relevant university policies related to such activities. Therefore, these guidelines are not exhaustive; they are intended to give a sense of what is generally permitted and what may raise concerns.

Please discuss your specific situation with program leadership before engaging in any external activity.

- Kempner fellows are appointed to a **full-time position** in the most inclusive sense. Per [university policy](#), every fellow is expected to give the University their primary professional loyalty, and to ensure outside obligations, financial interests, and activities do not conflict or interfere with this obligation to the University. Your primary focus and full effort must be spent working on research within and for the institute¹.
- As a Kempner appointee, you are also obligated to adhere to [Harvard policies on intellectual property](#) and to the [Kempner open science policies](#). Any activity you undertake cannot conflict with these policies or constrain your ability to publish.
- Any paid **or unpaid** activity for another entity must be reported to the Harvard University [Outside Activity and Interest Reporting \(OAIR\) system](#).
- Outside activities cannot lengthen the duration of your appointment or conflict with your research obligations.
- Paid appointments at other universities are generally not acceptable and must be discussed in advance.
- International fellows should ensure that any outside activities are consistent with the terms of their visa.
- Any activities you undertake outside of the fellowship must be undertaken on your own time and may not use any Harvard resource (including facilities, GPUs, cloud computing, software,

¹ Excerpted from: [Policies Relating to Research and Other Professional Activities Within and Outside the University](#)

space, technology, or other resources).

- Harvard has strict [limitations on the use of its name and logo](#). When working with an external entity, limit your identification with Harvard to your formal titles, and clarify that you are acting in an individual capacity. The external entity must not use the Harvard name, logo, or imply any sponsorship or endorsement by the University.
- Your external work must not interfere with or impede activities you would otherwise engage in at the Kempner or the University, including your full right and ability to publish work from the fellowship.
- You do not use, or are not expected to use, unpublished or proprietary research generated during your fellowship or knowledge gained through your affiliation with the Kempner Institute or Harvard.

Consulting Activities

Limited consulting — whether paid or unpaid — is usually permitted and subject to the limitations above. You must obtain approval for consulting activities and adhere to the following requirements:

- Briefly describe the nature of the consulting activity, expected time commitment, and the entity you are consulting with in an email to Elise, Sham, and Bernardo. Confirm that the program does not have concerns before accepting.
- If you're on a visa and are receiving compensation or reimbursement, you are required to get [this form](#) completed and signed by either Bernardo or Sham, and send it to the HIO.
- You and the entity must sign a copy of the [Harvard consulting addendum](#), the body of which should not be edited. A copy should be sent to Elise and to the compliance unit of the FAS Research Administration Office, at this address: outsideactivities@fas.harvard.edu
- Your work must be done on your own personal time and not interfere with or impede your work within the fellowship.
- You must not use any Harvard resource (including any facilities, GPUs, cloud computing, software, space, technology, or other resources).
- You may not engage other students, research fellows, faculty, staff or other members of Harvard University in your consulting work.
- You must not use unpublished or proprietary research generated during your fellowship or knowledge gained through your affiliation with the Kempner Institute or Harvard.
- You must update your [OAIR](#) conflict of interest report.
- Exceptions:
 - If you are consulting with a Harvard faculty member's start-up company, there may be significant restrictions due to the [faculty's conflict of interest policy](#). This must be discussed and resolved in advance of undertaking any work.
 - If you are 100% grant-funded, you are not permitted to engage in outside consulting.

Other activities that are usually allowed but must be reported through OAIR²:

- Accepting honoraria, travel reimbursement, paid authorship, or related compensation received from an entity other than Harvard University. Please note, there are specific, additional conflict of interest considerations if payment exceeds [\\$5,000 in total, per year](#).
- Paid or unpaid service on the boards and committees of organizations, so long as it does not distract unduly from University obligations.

Activities that might not be allowed and require discussion³:

- Situations in which the time or creative energy you devote to extramural activities appears large enough to compromise the amount or quality of your work and your participation in the fellowship.
- Activities (research projects, conferences, teaching programs, consulting agreements, etc.) that: (a) that involve or might reasonably be perceived to involve the University, however slightly, and (b) that violate or might reasonably be perceived to violate any of the [Principles Governing Research at Harvard](#) insofar as these principles are relevant to individual behavior.
- Situations in which you direct students in a research area from which you hope to realize financial gain. EG: asking students to work on projects or directing them in projects that relate to a start-up you participate in.

Activities that are unlikely to be allowed and must be discussed in advance⁴:

- Situations in which you assume executive responsibilities for an outside organization that might seriously divert your attention from University duties or create other conflicts of loyalty. EG: taking a management position in a start-up you created with an old colleague.
- Use of unpublished information emanating from University research or other confidential University sources for personal profit, or assisting an outside organization by giving it exclusive access to such information, or consulting under arrangements that impose obligations that conflict with the [University Intellectual Property Policy](#) or [Kempner Open Science Policy](#). EG: consulting with a company and giving that company early access to a model developed at the Kempner prior to making that model public.
- Circumstances in which a substantial body of research that could and ordinarily would be carried on within the University is conducted elsewhere to the disadvantage of the University and its legitimate interests.
- Any activity (research project, conference, teaching program, consulting agreement, etc.) that: (a) that involves or appears to involve the University significantly (for example, through the use of its resources or facilities, or the participation of colleagues, students, and staff, etc.); and (b) that violates any of the [Principles Governing Research at Harvard](#) insofar as these principles are relevant to individual behavior.

Leave of Absence for Significant External Activities:

² Ibid.

³ Ibid.

⁴ Ibid.

There are times in which Kempner Research Fellows are offered opportunities to work with an outside entity that exceeds the limited effort allowed under the full-time fellowship. It is possible, in very specific and limited circumstances, to be granted a short-term, unpaid, personal leave of absence to these activities and return to complete the fellowship.

As described above, we are unable to extend the fellowship program beyond three years to accommodate an external activity. Fellows will not be granted a leave of absence if program leadership believes it will materially impact the fellow's ability to meaningfully advance their research agenda during the three-year fellowship period.

There are also significant considerations related to intellectual property and open science. The Kempner fellowship requires that any work you undertake at the Kempner be made freely and publicly available at the time of publication. Work you undertake cannot impinge on that requirement. It is also a violation of University policy to share unpublished work of your own or others prior to making that work available to the general public.

It is also typical, particularly at for-profit entities or start-ups, that projects you undertake for them are considered their intellectual property, and they may not allow you to continue or share that work at Harvard upon your return.

Thus, the program would consider an unpaid leave of absence if:

- The leave of absence starts in the 2nd year of the fellowship and is for 6 months or less.
- Undertaking this outside work would explicitly and intentionally enhance your knowledge and experience, such that upon your return, it will enrich the work you do during the fellowship.
- You have a plan to ensure you have sufficient time to meaningfully advance your research agenda prior to the end of the fellowship on your return.
- Your mentors and program leaders agree that the time away from the fellowship would not negatively impact your research trajectory.

As described above, as with any external activity, you must not:

- Use or share unpublished or proprietary research generated during the fellowship or which you have knowledge of due to your relationship with the Kempner Institute or Harvard with the entity.
- Use any Kempner or Harvard University resources (e.g., facilities, technology, GPUs, non-public code, data, or tools, etc.) during the activity.
- Involve Harvard students, employees, post-doctoral fellows, or any other Harvard personnel in the work.
- Have any limitations on your right or ability to publish work started before or after your fellowship, or any limitations with respect to your academic freedom.
- Have any visa restrictions that limit your ability to engage in work outside the fellowship or that would require the University to change or extend your visa.

References

[Policies Relating to Research and Other Professional Activities Within and Outside the University*](#)
[Statement on Outside Activities of Holders of Academic Appointments](#)
[University Guidance on Conflicts of Interest and Commitments](#)
[FAS Financial Conflicts of Interest \(fCOI\) Policy](#)
[FAS Principles Governing Research at Harvard](#)
[Statement of Policy in Regard to Intellectual Property \(IP Policy\)](#)
[Addendum to Consulting Agreement](#)
[Conflict of Commitment Policy](#)
[Kempner Institute Open Science Policies](#)
[Principles Governing Research at Harvard](#)