

HARVARD UNIVERSITY



Provost Criteria

Originally Issued: June 2013

Responsible Office: Office for Sponsored Programs

Criteria and Procedures for Provost's Review of New Projects or Grants

The Provost's Office aims to facilitate academic programs, projects and research at Harvard by providing clear criteria and procedures for University-level review of research proposals that pose management challenges and/or reputational risk and by providing reasonable review and oversight of major projects and programs. This process is intended to streamline the review process for PIs and administrators, improve management and administration, and reduce risks for program participants, for individual researchers, for Schools, and for Harvard as an institution. This document describes the criteria that determine whether a proposal requires Provostial review.

Programs and projects that meet these criteria should be reviewed and approved by the Provost's Office before they are proposed to external funders. When unavoidable, proposals relating to international projects may be submitted to external funders prior to Provostial review, as long as they are submitted with the understanding that their status is contingent until they are reviewed and approved by the Provost.

Within the Provost's Office, proposals may be reviewed by the Vice Provost for Research, the University Director for Sponsored Programs, the Vice Provost for International Affairs and, in the case of some international projects, also by the University Committee on International Projects and Sites (UCIPS). In all cases, reviewers will consult with others when relevant.

Once a program or project has received Provostial approval, any significant program expansions or changes should be submitted through this process, so that additional Provostial review may occur.

1. The project has an aggregate budget of more than \$10 million for U.S.-based projects, or is an international program whose annual budget is greater than:

Table 1 - Project Budget

FAS, HMS	\$5.0 million
HBS	\$3.8 million
HSPH	\$3.0 million
HLS	\$1.5 million
HKS	\$1.3 million
HGSE, HSDM, GSD, HDS, SEAS, RIAS	\$1.0 million

2. The project involves the public use of Harvard University's name and/or trademark. Projects which use the name of a Harvard School or other subsidiary unit of the University do not need Provost's Review, but do require approval of the School Dean. Further information can be found on the Harvard Trademark Program website under [FAQs on Use of Harvard's Name](#), especially question 2.
3. The project supports the establishment of any new international site. For this purpose, "new international site" refers to: (1) real estate, including offices and research space, outside the U.S. that is leased for Harvard use for a period of six months or longer; or (2) a project outside the U.S. to which two or more Harvard faculty members, employees, staff members of an affiliated entity, independent contractors, post-doctoral fellows, or students are assigned and placed for a period of six months or longer; or (3) a project that involves significant work in, or the posting of a Harvard faculty member, employee, staff member of an affiliated entity, an independent contractor, post-doctoral fellow, or student to, countries or regions identified as 'High Risk' by Harvard's Global Support Services. ([View the Travel Risk Ratings.](#))
4. The project is international and involves human subjects research that requires IRB expedited or full review.

Note: If a proposal meets this criterion and no other criterion, it can be reviewed at the time of award rather than at the time of submission.

5. The project involves, or is allied with, the direct provision of medical or clinical services.
6. A majority of funds in the project (over 50%) will not be expended at Harvard but will be expended through vendors or subcontractors other than Harvard, or a majority of project activities will be conducted by persons who are not Harvard staff.

Exception: Projects in which more than 50% of funds are expended at Harvard-affiliated hospitals (list under "[HMS Affiliates](#)") do not require Provostial review.

7. The project has a substantial risk of violating Harvard's anti-discrimination policy.
8. The sponsor or project may present a serious reputational risk for the University or may otherwise attract significant adverse publicity to the University.
9. The project involves activities for which there is inadequate or uncertain program, financial and/or managerial infrastructure, which may be a special concern in projects that take place outside the United States.
10. The project involves a scope, scale, or type of work that is beyond the University's teaching and research mission or is especially unusual or complex.

Procedures

Proposals should be submitted for Provostial Review and Approval before the proposal is filed with potential funders, if at all possible, and in all cases before the activity is initiated.

The OSP or SPA reviewer will edit the Required Signatures in GMAS and add the "Provost Signatory" role to the list, which alerts the Associate Research Compliance Coordinator that there is an actionable item for Provostial Review. The Associate Research Compliance Coordinator will add additional OVPR reviewers if necessary. Using the text box in the "GMAS Signature Required" email generation screen, OSP/SPA reviewer will specify a department contact, the sponsor deadline, and a brief statement indicating the particular element(s) of the proposal that has triggered the need for Provostial Review. The Provost Reviewer will navigate to the GMAS Request Home Page from the email and perform the

review and, if no concerns, will electronically sign indicating approval to OSP/SPA that they may move forward with the submission or execution of the award agreement. If there are additional considerations or restrictions placed on the project, they will be communicated to the department contact, PI, and OSP/SPA reviewer.