Person of Interest (POI) Policy
Originally Issued:* July 15, 2021
Last Revised:* July 1, 2022
Responsible Office:* Identity and Access Management Services (IAM), HUIT

Policy Statement

This document describes the policy and practices for assigning a Person of Interest (POI) role to an individual through HUIT Identity and Access Management (IAM) systems. POI roles were defined to describe non-employee, non-student affiliations an individual may have in the Harvard community that support granting the individual access to resources, both digital and physical, under an appropriate level of oversight by the University. POI roles are necessary to clearly differentiate affiliations to the University that are distinct from employee, student or alumni roles.

This policy clarifies the responsibilities individuals and/or departments sponsoring POIs possess for the stewardship of POI data at the University and the use of access granted to individuals by their action.

Reason for Policy

Because POI roles grant individuals digital and physical access to University resources, it is important that POI identity and role data be accurate and consistently maintained over time. The type of services for which an individual is eligible is partially dependent on the type of POI role (e.g., vendor vs. family member), so it is important that POIs are classified correctly to ensure only access to appropriate resources is granted.

There are circumstances under which a POI role is not an appropriate means to grant access due to the level of risk associated with the access and the potential liability to the University and/or individuals. This policy clarifies when a POI role is an appropriate means for granting access and outlines cases in which POI roles may not be used.

Who Must Comply

This policy applies to all administrative groups and/or persons who sponsor, approve, create or administer Person of Interest affiliations at Harvard University. All Harvard University schools, tubs, local units, affiliate institutions, allied institutions and University-wide initiatives must comply.

If this policy conflicts with any other University Policy, term, external regulation, or law, the more restrictive provision will apply.
Harvard University schools, tubs and local units may have related Local Policies as long as they are consistent with and meet the minimum standards set by University Policies.

Policy Guidance

The statements below summarize key policy guidance dispersed throughout this policy document.

- POIs roles must use a predefined role type that captures the nature of a POI’s relationship with the University and makes it possible to generally categorize POIs into groups.
- Each POI role type is associated with an Affiliation and Assurance tier, which indicates the strength of affiliation the individual has with Harvard and the types of systems and resources to which the individual may be granted access.
- POI roles must be sponsored by an active, paid administrator or an active ladder faculty member employed by Harvard. At HMS, unpaid faculty are not eligible unless appointed in a pre-clinical department (e.g., HHMI faculty member in a pre-clinical department).
- When requesting, renewing or updating a POI role, sponsors must describe the individual’s role and duties at Harvard for which they are endorsing the POI role, attest to the POI’s legitimate business reason for accessing University resources, agree to actively support University guidelines related to conduct, and commit to maintaining POI role data promptly.
- POI roles are granted for a maximum term and renewal length based on the role type.
- POI role requests must be approved by someone other than the sponsor. In some cases, two levels of approval are needed depending on the role type requested.
- Participants in the POI process will be required to complete POI policy training in order to request and manage POI roles.
- POI roles may not be used to extend access to services or resources (e.g., email, file shares) for departing employees.
- POI roles for the purpose of research collaboration are permitted in limited circumstances as described under Research Collaboration in the Guidance for Classifying POIs section below. In specific units where research collaborator POI roles are supported, appropriate documentation and secondary approval is required.
- POI roles may not be used in place of a formal appointment where individuals performing similar roles and duties hold an appointment.

This Policy applies to all POI roles as of July 15, 2021 when the policy goes into effect. The IAM team will partner with schools and tubs to update role types, renewal dates, sponsors and sponsor delegates on existing POI roles to align with new policy requirements in advance of the policy effective date. Requirements for documentation and approval apply to new POI roles and POI roles being updated or renewed on or after July 15, 2021.
## Responsibilities

### I. Participants in the POI Process

The following table describes the participants in the POI process and the eligibility criteria for individuals to serve in these roles. Responsibilities for each of these participants is detailed below. 

*Although an individual may be eligible to serve as a sponsor and approver within the POI process, each POI requires a separate approver and sponsor and no individual may serve as both for the same POI.*

<table>
<thead>
<tr>
<th>Role</th>
<th>Description</th>
<th>Eligibility Criteria</th>
</tr>
</thead>
</table>
| Sponsor            | A person with standing at the University to request access for an individual via a POI role and attest to the POI’s legitimate business reason for requiring access. Sponsors can initiate requests for new POIs. They can also view POIs and POI requests, and initiate requests to update POI data on any POIs for which they are listed as the Sponsor. | Active, paid employees of Harvard in Employee Class:  
  - A (Admin & Professional)  
  - F (Senior Faculty)  
  - J (Junior Faculty)  
  - O (Other Academic)  
  - S (Support Staff)  

  Active, unpaid employees of Harvard in Employee Class:  
  - F (Senior Faculty)  
  - J (Junior Faculty)  

  At HMS, unpaid faculty are not eligible unless appointed in a pre-clinical department (e.g., HHMI faculty member in a pre-clinical department). |
| Sponsor Delegate   | A POI Sponsor can designate an individual to administer POI roles on their behalf. This individual is known as a Sponsor Delegate. Sponsor Delegates can initiate requests for new POIs. They can also view POIs and POI requests, and initiate requests to update POI data on any POIs for which they are listed as the Sponsor Delegate. While Sponsor Delegates can initiate requests, they cannot attest on behalf of the Sponsor. | Active, paid employees of Harvard in Employee Class:  
  - A (Admin & Professional)  
  - F (Senior Faculty)  
  - G (Graduate Students)  
  - J (Junior Faculty)  
  - O (Other Academic)  
  - S (Support Staff)  

  U (Service & Trade Hourly)  

  Active, unpaid employees of Harvard in Employee Class:  
  - A (Admin & Professional)  
  - S (Support Staff) |
<table>
<thead>
<tr>
<th>Role</th>
<th>Description</th>
<th>Eligibility</th>
</tr>
</thead>
</table>
| Local Approver          | An individual designated by a school, unit or department to review and approve POI requests. All POI requests must be reviewed and approved by a designated Local Approver for the school, unit or department. Local Approvers are granted permissions to review and approve requests based on department-level security. Local Approvers may also view POIs and POI requests and initiate requests to create or update POIs in their designated school, unit or department. | Active, paid employees of Harvard in Employee Class:  
A (Admin & Professional)  
O (Other Academic)  
S (Support Staff) |
| Central Approver        | An individual designated by Harvard University to review and approve POI requests for specific role types following local approval. Only certain types of POIs require central approval. Central Approvers are granted permissions to review and approve requests based on POI role type and department. Central Approvers may also initiate requests to update POIs for which they have Central Approver permissions. | Active, paid employees of Harvard in Employee Class:  
A (Admin & Professional)  
O (Other Academic)  
S (Support Staff) |
| Administrator           | An individual designated by a school, unit or department to review, audit and initiate updates on POI data for their unit. Administrators can view POIs and POI requests and initiate requests to create or update POIs. Administrators are granted permissions to review and update POI data based on department-level security. | Active, paid employees of Harvard in Employee Class:  
A (Admin & Professional)  
F (Senior Faculty)  
I (Teaching Assistants)  
J (Junior Faculty)  
L (Part-Time Service & Trade)  
O (Other Academic)  
S (Support Staff)  
U (Service & Trade Hourly)  
Y (Internal Post Docs)  
Active, unpaid employees of Harvard in Employee Class:  
A (Admin & Professional)  
S (Support Staff) |
| Reviewer                | A POI Reviewer is an individual designated by a school, unit or department to review POI data for their unit. POI Reviewers will be able to view POIs and POI requests but will not be able to initiate requests based on this role. (Users with a reviewer role may be able to initiate requests based on other eligibility, for example, if they are also central approvers.) | In order to serve as a POI Reviewer, an individual must be an active employee of Harvard University or an active POI. |
II. Responsibilities of Participants

A. Sponsor

By sponsoring a POI role for an individual, Sponsors assume the following responsibilities:

1. Ensure the POI request complies with the Harvard University Person of Interest Policy and other applicable Harvard policies.
2. Ensure that the role description, role type and role duration accurately reflect the POI's legitimate business reason to obtain access to University resources.
3. Agree to maintain the POI role including promptly updating data if anything changes, renewing the role if required, and terminating the role when the POI leaves or is no longer qualified to have the role, the nature of the work changes and the POI role is no longer appropriate, or there is no longer a business need for the role.
4. Agree to actively support University guidelines related to conduct and assist the University with communicating to an individual in the event of a conduct-related incident.
5. Arrange for sponsorship of the POI to be transferred to another authorized sponsor or for the role to be terminated if the Sponsor departs Harvard or switches to a role which no longer allows them to fulfill the responsibilities of a Sponsor for the POI.

B. Sponsor Delegate

Sponsor Delegates administer POI roles on behalf of a Sponsor. Sponsor Delegates assume the following responsibilities for any POI requests they process:

1. Ensure the POI request complies with the Harvard University Person of Interest Policy and other applicable Harvard policies.
2. Ensure that the role description, role type and role duration on the request accurately reflect the POI’s legitimate business reason to obtain access to University resources.
3. Agree to maintain the POI role including promptly updating data if anything changes, renewing the role if required, and terminating the role when the POI leaves or is no longer qualified to have the role, the nature of the work changes and the POI role is no longer appropriate, or there is no longer a business need for the role.

C. Local Approver

When reviewing and approving a POI request, Local Approvers are responsible for ensuring the following:
1. The requested POI role type and duration complies with the Harvard University Person of Interest Policy and represents a legitimate use case for a POI role rather than an appointment.

2. The services requested (e.g., ID card, email) are appropriate based on the responsibilities outlined.

3. The School/Unit and Department on the request accurately reflects the sponsoring unit.

4. The attesting Sponsor is eligible to sponsor the POI role and the POI role dates align with the Sponsor role dates (e.g., an employee whose term is ending on 6/30 should not be permitted to sponsor a POI through 9/30).

5. The ID description fields do not contain a job title.

6. Approval of the POI request will not create a duplicate POI role (role type, school/unit, and sponsor are unique from existing active roles, and/or dates do not overlap).

D. Central Approver

When reviewing and approving a POI request, Central Approvers are responsible for ensuring that the requested POI role type complies with the Harvard University Person of Interest Policy and other applicable Harvard policies.

E. Administrator

Administrators are responsible for reviewing and auditing POI data for their school, unit or department and either directly initiating requests to create or update POI data or coordinating with Sponsors and/or Sponsor Delegates to update POI data. POI Administrators assume the same responsibilities as POI Sponsor Delegates when initiating POI requests.

F. Reviewer

Reviewers are responsible for reviewing and auditing POI data for their school, unit or department and coordinating with Administrators, Sponsors and/or Sponsor Delegates to update POI data as needed.

G. Authorized Requestor

Each school/tub is responsible for designating one or more Authorized Requestors for the POI Portal. Authorized Requestors are responsible for requesting access for a certain group of individuals within a school/tub or for individuals across an entire school/tub, depending on local policies and procedures. Authorized Requestors must determine the minimum level of system access necessary for each designated user to perform his or her required job duties. Authorized Requestors must send all requests to IAM using established practices and must maintain documentation to support those requests.

Each year, Authorized Requestors must review the list of users and their associated access for appropriateness, making changes where needed. Authorized Requestors must sign off on final lists for their respective areas.
Procedures

I. Guidance for Classifying POIs

When a POI role is assigned to an individual it must use a predefined role type. These role types are intended to capture the nature of a POI’s relationship with the University and make it possible to generally categorize POIs into groups. The type of services for which an individual is eligible is partially dependent on the type of POI role, so it is important that POIs are classified correctly to ensure only access to appropriate resources is granted. Each POI role type is associated with an Affiliation and Assurance tier, which indicates the strength of affiliation the individual has with Harvard and the types of systems and resources to which the individual may be granted access. A POI role may be held concurrently with an employee, student, alumni or other POI role when it represents a distinct and independent affiliation.

If a POI does not appear to fit into any of the predefined role types, contact the local human resources office for your school or unit for guidance. If the local human resources office, in consultation with Faculty/Academic Affairs (as appropriate), agrees that the use case is not supported by the predefined role types it may escalate the request to the IAM team for review.

A. Individually Sponsored POIs

Most POI roles are requested and sponsored by an individual who takes responsibility for the affiliation and is recorded as the POI Sponsor as part of the assignment process. A list of POI role types that are sponsored by individuals along with descriptions and examples can be found in Appendix A: Individually Sponsored POI Role Types.

Some individually sponsored POI Role Types are restricted to use only by certain units at the University. A list of these role types can be found in Appendix B: Restricted POI Role Types.

B. Departmentally Sponsored POIs

There are some types of POI affiliations for which a named individual sponsor is not required in the IAM systems. These affiliations are fed from and updated by external source systems.

A list of POI role types that are sponsored by departments can be found in Appendix C: Departmentally Sponsored POI Role Types.

C. Inappropriate Use of POIs

There are certain use cases for which a POI role is not appropriate. These are detailed below.

1. Research Collaboration

In most Harvard schools and units if an individual is in a lab actively participating in research or is requesting access to otherwise inaccessible Harvard materials in conjunction with the ongoing work of a Principal Investigator, they should have a formal appointment rather than a POI role. There are two exceptions to this:
a) An industry collaborator (e.g., consultant/vendor) who will be collaborating on research pursuant to an IP agreement between Harvard and the outside vendor that has been approved in place of the standard Visitor Participation Agreement and Acknowledgement of Risk and Release of Claims documents.

b) A research collaborator in a school or unit that supports centralized approval of Research Collaborator POI roles.

The Research Collaborator POI role type will only be available for selection in schools and units where centralized approval is supported. Ordinarily, Research Collaborators are expected to have paid employment outside of Harvard. Research Collaborators should have a legitimate and documented research-related business reason to access university space or resources. Requests for Research Collaborator POI roles must include the following documentation as attachments:

a) Signed Visitor Participation Agreement (VPA) or documentation of a signed electronic Participation Agreement (PA) collected prior to employment or affiliation outside of Harvard. Note: Visitors from the Massachusetts Institute of Technology (MIT) are not required to submit a VPA form provided they have first signed MIT’s own IP agreement (the “IPIA”), with the exception of MIT undergraduates, who must submit a VPA form. If you are unable to determine whether a visitor from MIT has signed the IPIA, contact OTD by e-mail at otd@harvard.edu for assistance.

b) Signed Acknowledgement of Risk and Release of Claims (if accessing one of Harvard’s laboratories). Note: Employees of one of the 15 teaching hospitals and institutes associated with the Harvard Medical School are not required to complete this form.

c) A signed and counter-signed form, letter or document outlining the scope of activities and the nature of the collaboration and relationship with Harvard. This document must specify that the POI is not an agent or employee of Harvard.

2. Extending Access for Departing Employees

POI roles may not be used to extend access for departing employees or other Harvard affiliates who wish to retain access to email, file shares or other resources to which their employee role granted them privileges. Continuing access beyond the standard grace periods allotted carries significant risk as it is difficult to restrict access to specific services (e.g., just email) as long as an individual continues to have an active role at the University, and it may create the misimpression that the individual remains a University employee or agent. For departing individuals, appropriate arrangements should be made to facilitate transition (e.g., transfer of email or research files consistent with University off-boarding policies) in advance of the departure date. If a departing affiliate has a legitimate business need to retain access to services following their departure, units should consult with Human Resources or Academic/Faculty Affairs about when an unpaid appointment through a formal appointment process may be appropriate. An exception may be made for departing
researchers and research trainees to continue on as Research Collaborator POIs in schools or units that support centralized approval of these roles as long as all requirements of the Research Collaborator POI role and any additional school-specific requirements are met.

3. **In Place of a Formal Appointment**

If the role and duties the individual is performing are consistent with those performed by other individuals in the school/unit with an appointment (paid or unpaid) the sponsor should pursue an affiliation through a formal appointment process rather than through a POI role. Exceptions to this are made for contingent workers hired through Fieldglass, consultants with a formal statement of work, and vendors paid through a contracted service provider.

4. **Minors Covered by the Policy for the Safety & Protection of Minors**

Any minor being overseen by the [Policy for the Safety & Protection of Minors](#) should not be given a POI role. Minors working on campus or participating in an internship or development opportunity should be given a formal appointment as a temporary employee or intern (note that unpaid interns must meet the test for intern/trainee status under the Fair Labor Standards Act; consult with your local Human Resources office). Please see the [Policy for the Safety & Protection of Minors](#) for additional information regarding minimum standards and expectations for minors who participate in activities on campus.

II. **Person of Interest Policy Training**

All Participants in the POI process (e.g., Sponsors, Sponsor Delegates, Local Approvers, etc.) will be required to complete POI policy training in order to request, approve and manage POI roles.

III. **POI Portal Access**

Access to the POI Portal will be granted to eligible participants in the POI process only after the participant has completed Person of Interest Policy training. All POI Portal access requests must originate from tub-appointed Authorized Requestors. All data and information stored in the POI Portal is considered confidential and must be handled in accordance with the University’s [Information Security Policy](#).

IV. **Person of Interest Review and Approval Procedure**

A. **Requesting a New POI Role**

1. **Step 1: Preparer Completes Request**

Any individual who is eligible to sponsor a POI role or serve as a POI sponsor delegate can prepare a request for a new POI role. On the request, the preparer will be required to provide information to confirm the POIs identity (legal name and date of birth) as well as a description of the person’s role and duties at Harvard for which they are requesting a POI role. To avoid creation of duplicate identities or overwritten identities, it is critical that the legal date of birth and name be collected and entered in the POI Portal. Fake data should
never be entered when requesting a POI role. All POI role requests will be required to include Role Type, School/Business Unit, Department, Role Start and End Dates and Sponsor information. Certain role types will require additional information. For example, requests for Vendor POI roles will require inclusion of Company information. Specific requirements are detailed in the Notes section of Appendices A and B, which describe individually sponsored role types. On the request, the preparer may also request that the POI be granted specific services such as an ID card. An explanation will be required for any services requested. Upon submitting the request into the approval workflow, the preparer will be required to attest that the request complies with this policy and that the information submitted reflects the POI’s legitimate business reason to obtain access to University resources.

2. **Step 2: Sponsor Review**

After a request to create a POI is submitted into the approval workflow, the request will require review and approval by the POI Sponsor. Following review of the request, the POI Sponsor will be required to attest that the request complies with this policy, that the information submitted reflects the POI’s legitimate business reason to obtain access to University resources, and that the request is an appropriate use case for a POI role. In addition, the Sponsor is required to confirm that they accept responsibility for maintaining the POI role data, for supporting University guidelines related to conduct, and for transferring sponsorship or terminating the POI role in the event that they depart Harvard. If the Sponsor prepared and submitted the request, these attestations will be included with the initial submission and will not require a separate step.

3. **Step 3: Local Approver Review**

Following review and approval by the POI Sponsor, the request must be reviewed and approved by a Local Approver. When reviewing a request, the Local Approver is expected to verify all requirements outlined in the Local Approver responsibilities section above. An individual may not serve as the sponsor and approver for the same POI. Thus, every request will need to have two distinct users involved in initiation, sponsorship, and approval. If a user has multiple roles that would authorize them to initiate, sponsor, and approve requests, the system will prevent the user from approving a request they both initiated and sponsored.

4. **Step 4: Central Approver Review**

Certain POI role types require review by a central office. The Central Approver is responsible for ensuring that the POI request complies with this policy and other applicable Harvard policies.

B. **Request to Update or Terminate an Existing POI**

Sponsors, Sponsor Delegates, Local Approvers and Administrators can initiate requests to update data on a POI role or terminate a POI role from the My POIs Dashboard in the POI Portal.
Requests to update data on a POI role will follow the same approval workflow as requests to create a new POI role, with each approver responsible for reviewing and attesting to the request in the same way.

Requests to terminate a POI role (either on the current date or any date prior to the existing role end date) are not required to go through an approval workflow. The change will be effective as soon as the request is submitted.

V. Access to Systems and Services

As noted above, each POI role type is associated with an Affiliation and Assurance Tier, which indicates the strength of affiliation the individual has with Harvard and the types of systems to which the individual may be granted access. Assurance Tiers align with the risk levels for Harvard Systems outlined in the Information Security Policy. For example, POI role types in the Medium Assurance Tier may be granted access to Low- or Medium-risk systems, but not High-risk systems.

Eligibility for services such as an ID card or Harvard email address is partially determined by POI role type insofar as certain role types are not eligible for specific services. Any restrictions in service eligibility are outlined in Appendices A, B, and C, which describe POI role types in detail. If a POI requires access to a centrally governed service (ID card, Office 365 Email, SharePoint, OneDrive, Teams, Google University), the preparer must indicate this on the request to create the POI role and provide an explanation for the request. Approval of the POI request will include approval of the requested services. Once approved, preparers will still need to follow the normal onboarding procedure for their school/unit to ensure that services are provisioned per the request.

Any individual whose role meets the definition of a POI must be given access to resources via the POI process and not through other mechanisms (e.g., guest accounts). When renewing POI roles, access must not be renewed until all required paperwork is completed and the POI role extension has been approved and finalized in the POI Portal.

VI. Person of Interest Auditing

Sponsors, Sponsor Delegates and Local Approvers will receive monthly emails listing all POIs within their purview. These individuals along with Administrators and Reviewers can also see a list of POIs in their purview at any time by visiting the My POIs Dashboard in the POI Portal. It is expected that Sponsors, Sponsor Delegates and Local Approvers review all POIs in their purview at least monthly and promptly process changes to POI data as required.

VII. Person of Interest Compliance Monitoring

Each school/tub is expected to implement a process for periodically monitoring compliance with the POI policy. In addition, IAM will monitor POI role data and contact schools/tubs if questionable uses are identified.
If a participant in the POI process is found to be creating or approving POI roles in violation of the POI policy it may result in disciplinary action. In addition, IAM, in consultation with the participant’s school/tub, may revoke system access and the ability to sponsor, administer and approve POI roles.

VIII. Terminating Person of Interest Roles with Ineligible Sponsors

Sponsors of POI roles are responsible for arranging for sponsorship of the POI to be transferred to another authorized sponsor or for the role to be terminated if the Sponsor departs Harvard or is in a role which is no longer authorized to serve as a sponsor for POIs. Local Approvers, Administrators and Sponsor Delegates may also initiate transferring of POI roles from an ineligible sponsor to an eligible sponsor.

Effective January 15, 2022, IAM will automatically update the role end date of any POI role with an ineligible sponsor if sponsorship is not transferred within 10 days of the current sponsor becoming ineligible. After 10 days the role end date will be set to 45 days from the date the sponsor became ineligible unless the current role end date is earlier than this date. This window provides time for units to identify a new sponsor and update the sponsorship and role end date on the POI role if it should continue while limiting the duration of POI roles associated with ineligible sponsors. For POIs whose sponsor became ineligible more than 10 days prior to the January 15, 2022 effective date, the POI role end date will be updated to 35 days after the effective date unless the current role end date is earlier than this date.

Definitions

Employee Class: A major grouping of employees in PeopleSoft. Employee Class defaults from job code and helps inform benefits eligibility and costing for payroll transactions.

Contact/Responsible Offices

This Policy has been developed with input and contributions from the following offices along with local Human Resources, Faculty Affairs and Academic Affairs offices in the schools:

- Harvard Human Resources
- Office of Faculty Development & Diversity
- Office of the General Counsel
- Office of Labor and Employee Relations
- Office of the Vice Provost for Advances in Learning
- Office of the Vice Provost for Research

These offices will be engaged in regular review of and revisions to this Policy.

Identity and Access Management Services (IAM), Harvard University Information Technology is responsible for maintaining this Policy and acting as a resource for schools and units with questions regarding this Policy. It will also provide centralized training resources regarding this Policy.
Revision History

07/15/2021: Policy Implemented

08/09/2021: Policy revised to expand eligibility for Sponsor, Sponsor Delegate and Administrator roles based on business impact to schools and units. Visitor role reinstituted to support University coronavirus policy. Updated link to POI Portal Information and User Guides.

09/22/2021: Policy revised to limit Sponsor eligibility for unpaid faculty at HMS to only unpaid faculty appointed in a pre-clinical department and to update allowability of Participation Agreements (PAs) in lieu of Visitor Participation Agreements (VPAs) for certain Research Collaborator POIs.

01/02/2022: Policy revised to reflect new process to update end dates on POI roles where the associated Sponsor is no longer eligible to serve as a sponsor. Central Approver role expanded to allow initiation of update requests on POI roles for which a user has Central Approver permissions.

07/01/2022: Updated Policy Statement to distinguish POI roles from the associated identities and clarify purpose of POI affiliations. Clarified that a POI role may be held concurrently other roles when it represents a distinct and independent affiliation. Clarified expectations around collection of legal date of birth and name when requesting POI roles. Updated initial max term length on Tenant and Vendor roles.

Related Resources

Affiliation and Assurance Tiers
Contingent Workforce Program
HMS Person of Interest Resources
Independent Contractor Policy
Information Security Policy
POI Portal Information and User Guides
Policy for the Safety & Protection of Minors

Minors in Labs Policy
Research Policies & Guidance

Guidance for Use of the Harvard Participation and Visitor Participation Agreements
Research Data Security
Staff Personnel Manual

Payment Categories and Hiring Methods for Individuals Classified as an Employee
Types of Employment

Appendices

Appendix A: Individually Sponsored POI Role Types
Appendix B: Restricted POI Role Types
Appendix C: Departmentally Sponsored POI Role Types
**Appendix A: Individually Sponsored POI Role Types**

Unless otherwise noted, the maximum term and renewal lengths for individually sponsored POI roles is one year and the POI role information will be set to restricted and will not appear in Harvard directories. The Assurance Tiers indicated below align with the risk levels for Harvard Systems outlined in the Information Security Policy, e.g., POI roles in the Medium Assurance Tier may be granted access to Low- or Medium-risk systems, but not High-risk systems.

<table>
<thead>
<tr>
<th>Role Type</th>
<th>Description</th>
<th>Examples</th>
<th>Assurance Tier</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Academic Advisor</td>
<td>An academic advisor to a Harvard student with no other Harvard affiliation</td>
<td>A thesis advisor from outside of Harvard who needs my.harvard access. An advisor for medical school applications who needs access to various systems.</td>
<td>Medium</td>
<td></td>
</tr>
<tr>
<td>Consultant</td>
<td>Someone providing consulting services, either independently or through a firm</td>
<td>A sole-proprietor technology consultant advising Harvard. An employee of a consulting firm engaged on a project at Harvard. An independent contractor approved through HR.</td>
<td>High</td>
<td>It is expected that Consultants have an executed Consulting Agreement and Statement of Work with the sponsoring department. Independent contractors must be approved through HR. Individuals hired through Yoh/Fieldglass should be processed as Contingent Worker POIs, not Consultant POIs.</td>
</tr>
<tr>
<td>Contingent Worker</td>
<td>A contingent worker hired through Fieldglass/Yoh</td>
<td>A temp from an agency such as Randstad. A contract developer or business analyst from an IT staffing agency. A contract financial analyst from a financial staffing agency.</td>
<td>High</td>
<td>The max term for agency temps in overtime-eligible jobs is 3 months, except for backfills, which may extend to 6 months. All Contingent Worker POIs are approved through Harvard HR. Directory settings for Contingent Worker POIs will default to Harvard visible. POI Sponsors can request to restrict this.</td>
</tr>
<tr>
<td>External Administrative Affiliate</td>
<td>An individual from outside Harvard partnering on an administrative initiative or process</td>
<td>A registrar from another school who needs access to my.harvard to assist with managing cross-registration. A member of a board or committee from an external institution.</td>
<td>High</td>
<td>External Administrative Affiliate POIs are not eligible for Harvard email.</td>
</tr>
<tr>
<td>External Core Customer</td>
<td>External customers of shared-use core facilities or fee-for-service research facilities</td>
<td>Customers of the Mouse Behavior Core, MicRoN facility, or Neurobiology Imaging Facility. Users of the Center for Nanoscale Systems or Harvard Center for Biological Imaging.</td>
<td>High</td>
<td>External Core Customers are expected to sign a User Agreement and/or Memorandum of Understanding (MOU) prior to receiving a POI role. In addition, if accessing one of Harvard’s laboratories and not an employee of one of the 15 teaching hospitals and institutes associated with HMS, Core Customers must sign an Acknowledgement of Risk and Release of claims. Core Customers are not eligible for Harvard email.</td>
</tr>
<tr>
<td>Family Member/Family Support</td>
<td>Family members or support providers for Harvard affiliates who need physical access to Harvard housing or daycare</td>
<td>A spouse or partner of a professor, resident tutor or proctor living in undergraduate housing. A family member of a child enrolled in a campus Child Care Center. HBS Partners. A long-term caregiver or dog walker for a resident in Harvard housing.</td>
<td>Low</td>
<td>The associated Harvard affiliate is required on requests. The initial term length may be up to three years as long as the role end date does not extend beyond the Harvard affiliate’s role end date. Family Member/Family Support POIs are not eligible for Harvard email.</td>
</tr>
<tr>
<td>Role</td>
<td>Definition</td>
<td>Medium/High/Low</td>
<td>Notes</td>
<td></td>
</tr>
<tr>
<td>-------------------------------------</td>
<td>-----------------------------------------------------------------------------</td>
<td>-----------------</td>
<td>-------</td>
<td></td>
</tr>
<tr>
<td>Field Education Supervisor</td>
<td>A non-appointed supervisor of a student in a field education placement</td>
<td>Medium</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>A church pastor overseeing an HDS student’s in-field study.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Field Ed Supervisors with ongoing relationships with HDS are given appointments following completion of a one-year course. Field Ed Supervisors supervising a student on a one-off basis are given POI roles. Completion of the course is not required. Field Education POIs are not eligible for an ID card.</td>
<td>Medium</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Incoming Employee/Transfer</td>
<td>An individual with an accepted job offer who needs an active role to facilitate the onboarding process</td>
<td>Medium</td>
<td>The Incoming Employee POI role is to enable units to begin the onboarding process so that appropriate accounts are established and a new employee can begin work on their start date. Incoming employees should not be accessing resources and may not be asked to complete work in advance of their start date. The max initial term length for Incoming Employee POIs is 21 days (14 days in advance of start date to 7 days after start date).</td>
<td></td>
</tr>
<tr>
<td></td>
<td>An incoming employee who cannot come to campus in advance of their start date to complete their I-9. An interdepartmental transfer for whom the new school/unit would like to establish accounts.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Interschool Affiliate</td>
<td>An active affiliate who needs access to resources in a School/Unit other than the one where their primary affiliation resides</td>
<td>High</td>
<td>Interschool Affiliate POIs are not eligible for an ID card or email address through this role. It is expected that these services would be provided through their primary affiliation.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>An FAS faculty member teaching a class at the Law School who needs access to HLS resources. A Central Admin employee who supports one of the Schools. A student in a joint degree program who needs access to resources in their joint school.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Security</td>
<td>A company representative of a security-service provider</td>
<td>High</td>
<td>Company name is required on requests. All Security POIs are approved through HUPD.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>A Securitas or Watts security guard working at Harvard.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tenant</td>
<td>An individual requiring physical access to property leased or rented from Harvard</td>
<td>Low</td>
<td>Building is required on requests. The max initial term length for Tenants is two years. Tenants are not eligible for Harvard email.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>An employee of a company leasing lab space from the University. A resident of Harvard University Housing with no other affiliation.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Vendor</td>
<td>A company representative of a service provider to Harvard</td>
<td>High</td>
<td>Company name is required on requests. The max initial term length for Vendors is 13 months.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>A technician for a company such as Siemens, Ricoh or Verizon. An employee of a Harvard Child Care Center. Employees of roofing, moving or other service companies hired by Harvard.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Visitor – COVID</td>
<td>A visitor who is on campus for more than 7 days and must enroll in the University’s COVID testing program per coronavirus policy guidance.</td>
<td>Low</td>
<td>The max initial term length for Visitors is 6 months. Visitors are not eligible for an ID card or Harvard email.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>A participant in the Ceramics or Dance program. A participant in a weekly lecture series.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Volunteer</td>
<td>An individual 18 years of age or older volunteering their services or donating their time for University activities</td>
<td>Low</td>
<td>Sponsors should consult with their local human resources offices prior to making arrangements for volunteer services to ensure that individuals are appropriately classified as volunteers. Additional information on volunteers may be found at the Office of the General Counsel's frequently asked questions (restricted access).</td>
<td></td>
</tr>
<tr>
<td></td>
<td>A club or Shared Interest Group volunteer for Harvard Alumni Association, a volunteer guide at the Harvard Arboretum</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
## Appendix B: Restricted POI Role Types

The role types below are restricted in use to the units outlined in the Notes section.

<table>
<thead>
<tr>
<th>Role Type</th>
<th>Description</th>
<th>Assurance Tier</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>AA&amp;D Affiliate</td>
<td>An affiliate of Alumni Affairs &amp; Development requiring access to HarvardKey-protected development systems</td>
<td>High</td>
<td>For Alumni Affairs &amp; Development (AA&amp;D) use only. AA&amp;D Affiliate POIs are not eligible for an ID card or Harvard email. Role limited to 3 years.</td>
</tr>
<tr>
<td>Dependent</td>
<td>Health care dependent (spouse, partner, or adult child) of a Harvard Affiliate who is receiving care at Harvard University Health Services</td>
<td>High</td>
<td>For Harvard University Health Services (HUHS) use only. The associated Harvard affiliate is required on requests. Dependent POIs are not eligible for Harvard email.</td>
</tr>
<tr>
<td>HMC Employee</td>
<td>An employee of the Harvard Management Corporation (HMC)</td>
<td>High</td>
<td>For Office of the Controller, Financial Administration Department use only. HMC Employee POIs are not eligible for Harvard email. Role limited to 1 year.</td>
</tr>
<tr>
<td>Hospital Administrator</td>
<td>An administrator at a Harvard-affiliated hospital requiring access to Harvard resources. For example, a UGME administrator at BCH who needs access to Tableau reports about medical students rotating at their hospital. A BIDMC employee serving as department administrator for a clinical department who needs access to PeopleSoft hire forms and the HMS faculty search portal.</td>
<td>High</td>
<td>For Harvard Medical School (HMS), Harvard School of Dental Medicine (HSDM) and Harvard Chan School of Public Health (HSPH) use only. Hospital Administrator POIs are not eligible for an ID card or Harvard email. Role limited to 1 year.</td>
</tr>
<tr>
<td>Other</td>
<td>A sponsored affiliation that does not fall into any of the predefined role types</td>
<td>Medium</td>
<td>For Identity and Access Management Services use only. Role limited to 1 year.</td>
</tr>
<tr>
<td>Oversee</td>
<td>A Member of the Board of Overseers or former Corporation Member</td>
<td>High</td>
<td>For Office of the Governing Boards use only. Role end date aligns with Board term.</td>
</tr>
<tr>
<td>Partner of Deceased Retiree</td>
<td>The partner of a deceased retired Harvard employee</td>
<td>Low</td>
<td>For Harvard Human Resources (HHR) use only. Partner of Deceased Retiree POIs are not eligible for Harvard email. Role limited to 3 years.</td>
</tr>
<tr>
<td>Research Collaborator</td>
<td>Individuals who do not hold a Harvard appointment or employment but who are participating in an active research collaboration with a Harvard-based researcher and have a legitimate and verified business need to access Harvard research space, data or systems to conduct their collaborative research work.</td>
<td>High</td>
<td>A list of schools that support Research Collaborator roles may be found on the IAM website. In all other schools/units, consult with faculty affairs/academic affairs regarding an appropriate appointment type. Requests must include a signed Visitor Participation Agreement or documentation of an electronically signed Participation Agreement, a signed Acknowledgement of Risk and Release of claims (if accessing one of Harvard’s laboratories and not an employee of one of the 15 teaching hospitals and institutes associated with HMS) and a signed and counter-signed form or document outlining the scope of work, nature of the collaboration and relationship with Harvard. All Research Collaborator POIs are approved centrally. Role limited to 1 year.</td>
</tr>
</tbody>
</table>
Appendix C: Departmentally Sponsored POI Role Types

The role types below are only created through feeds from source systems.

<table>
<thead>
<tr>
<th>Role Type</th>
<th>Description</th>
<th>Assurance Tier</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Delegate Payer</td>
<td>A delegate set up by a student in my.harvard to view the student account and make payments</td>
<td>Low</td>
<td>Role fed directly from my.harvard. Role end date aligns with affiliated student’s role end date. Delegate Payer POIs are not eligible for any services including ID card or Harvard email.</td>
</tr>
<tr>
<td>HLS External Affiliate</td>
<td>Role granted to HLS Full Time Faculty, Visiting Faculty or Lecturer on Law between paid appointments to support ongoing HLS affiliation</td>
<td>High</td>
<td>For Harvard Law School (HLS) use only. Role fed by the HLS Faculty Information System. Oversight provided by HLS Office of Academic Affairs.</td>
</tr>
<tr>
<td>Retiree</td>
<td>A retired Harvard employee</td>
<td>Medium</td>
<td>Role is system generated based on employment status feed from PeopleSoft. No end date. Role terminates upon retiree death. Retiree POIs are not eligible for Harvard email.</td>
</tr>
<tr>
<td>Smithsonian Employee</td>
<td>An employee of the Smithsonian Astrophysical Observatory (SAO)</td>
<td>High</td>
<td>For use by the SAO only. Roles are fed directly from the SAO. Role end date aligns with term if applicable. Smithsonian Employee POIs are not eligible for Harvard email.</td>
</tr>
</tbody>
</table>