



SMITHSONIAN INSTITUTION INDEPENDENT FELLOWSHIPS

1. Purpose	1
2. Background and Definitions	1
3. Applicability	3
4. Responsibilities	3
5. Policy	6
6. Independent Fellows' Standards of Conduct	10
7. References	12

1. PURPOSE

The Smithsonian Institution (SI) seeks to maintain diverse, supportive, innovative, and scholarly fellowship programs and to welcome fellows into the SI community. These opportunities allow SI to further increase and diffuse knowledge using Smithsonian collections, facilities, and experts.

The purpose of this directive is to (1) distinguish between the two fellowship categories available at the Smithsonian, Independent Fellowships and Employment Fellowships¹, and (2) establish the policies and authorities needed to administer Independent Fellowships and appoint individuals to those roles at the SI.

2. BACKGROUND AND DEFINITIONS

Fellowships at the SI have always encompassed both independent and supervised research, and fellowships are needed to fully support and participate in national and international research endeavors. However, due to foundational differences in the activities undertaken as either an independent researcher or as a researcher who receives direction from a project lead, SI must administer each of these types of fellowships differently.

Independent Fellowships versus Employment Fellowships

Independent Fellowships are: (i) SI academic appointments where independent research or study is the sole activity; (ii) governed by this directive and applicable handbooks; and (iii)

¹ Employment Fellowships are temporary SI staff positions and are administered by the Office of Human Resources. Employment Fellowships are governed by [SD 213](#), *Trust Personnel Handbook*, and applicable guidance, including [guidance for hiring for grant and contract funded staff](#) available on the Office of Human Resources' webpages.

administered by the **Office of Academic Appointments and Internships (OAAI)**. The individuals who are appointed to these fellowships receive advice and assistance from an SI Advisor and are supported by stipends (internally or externally), not compensation.

Independent Fellowships shall meet the following conditions:

- The fellowship is an award with no requirement of any substantial, clear, quid pro quo from the recipient and does not take the place of a service contract or a procurement for services;
- The appointed fellow conducts research according to the fellow's submitted proposal and can change direction, if desired;
- Neither the funder nor the fellow's SI Advisor exercises direction or supervision over the fellow's research, except to the extent the research has deviated so significantly from the submitted proposal that the funding is no longer supporting the agreed-upon line of inquiry;
- No rights are reserved in the fellow's intellectual property by the sponsoring entity or the institutional grant recipient;
- The fellowship is not conditioned upon past, present, or future services by the recipient;
- Without the fellowship, the specific research would not need to be performed by an employee or contractor; and/or
- The fellowship stipend amount is unrelated to the amount paid to employees for performing similar activities.

Employment Fellowships are Trust-funded temporary staff positions where individuals work under the supervision of an SI supervisor, advance areas of research guided by SI, and/or effectively complete services for SI. Individuals in these positions may or may not work in close collaboration with SI staff. This fellowship category is intended to include fellows who are written directly into grants to carry out specific responsibilities, but also more broadly to include fellows who work collaboratively with SI staff. Employment Fellowship positions are defined by standardized position descriptions, and the individuals who are hired are provided trust employment salary and benefits, as governed by SD 213, *Trust Personnel Handbook*, in [Chapter 300](#), and are administered by the **Office of Human Resources (OHR)**.

Employment Fellowships exhibit the following characteristics:

- The individual is selected based on experience and the ability to perform activities pursuant to ongoing SI research activities, including those performed under specific SI research programs, sponsored projects, grants, or endowments;
- The work of the hired individual is managed and supervised by an SI supervisor and the individual is not given independence or flexibility in selecting or changing the direction or objective of the research;
- The SI supervisor directs the individual's activities by, among other things, specifying work hours and locations, tasks, goals, and deliverables;

- The hired individual undertakes the responsibilities in the position description for which the individual is hired; and/or
- The proposed compensation is a salary for services performed.

When to Use Independent Fellowships or Employment Fellowships

When the **research proposed is independent** and the appointment meets the conditions of an Independent Fellowship listed above, SI units have traditionally brought these fellows in as Independent Fellows. This policy now allows units to choose to bring those fellows on as either Independent or Employment Fellows, if the funding source (internal or external) allows.

If the **research proposed has requirements** to perform or provide services for SI, if there are requirements of supervision or research direction, and/or if the funding source (internal or external) requires it, then the fellow must be brought in as an Employment Fellow.

Whether doing independent or directed research, individuals hired for Employment Fellowships will be subject to all Smithsonian policies and guidelines applicable to the individual's temporary trust employment.

3. APPLICABILITY

This policy governs the appointment and conduct of Independent Fellowship opportunities, the individuals appointed to Independent Fellowships, and the units hosting these appointments.

This policy does not govern the appointment of Employment Fellowships and the individuals hired into temporary trust positions. Rather, those are governed by SD 213 and applicable trust hiring guidelines, and are administered by the OHR.

4. RESPONSIBILITIES

The **Office of Academic Appointments and Internships (OAAI)** has primary authority to establish the requirements for all SI Independent Fellowship programs and ensure that all Independent Fellowship programs and appointments meet those requirements.

The **OAAI** is responsible for:

- advising senior leadership, directors, advancement staff, and the SI community on matters of SI policy related to Independent Fellowships;
- developing, administering, and tracking academic appointments across the SI, including collecting and retaining all agreements associated with Independent Fellowship appointments and/or extensions;
- working with units to develop new Independent Fellowship opportunities that comply with SI policies and procedures;

- determining the minimum and maximum stipend levels for all Independent Fellowships;
- determining the propriety, approval, and awarding of academic appointments, including confirming new and extending existing Independent Fellowship appointments;
- providing guidance to SI units regarding the classification of Independent and Employment Fellowships; and
- ensuring that Independent Fellows are made aware of their obligation to comply with SI policies applicable to Independent Fellows, such as, but not limited to, the responsible research requirements and policies prohibiting discrimination and workplace harassment.

The **Office of Sponsored Projects (OSP)** is responsible for:

- ensuring appointees on sponsored projects meet the requirements of those funding sources; and
- guiding SI staff (Principal Investigators) in properly budgeting for fellowships on their sponsored project proposals.

The **Office of Global Affairs (OGA)** is responsible for:

- confirming the eligibility of foreign national candidates as it relates to immigration status and work authorization before the academic appointment begins;
- providing immigration support to fellows and the OAAI, including the issuance of enabling documents for the appropriate immigration status for fellows who are foreign nationals; and
- providing orientation and ongoing support for maintenance of immigration status to fellows in an SI-sponsored Bridge USA Exchange Visitor Program.

Unit Directors (or their designees) are responsible for:

- designating an Academic Appointment Coordinator, either as a full-time role or collateral duty;
- determining the proper classification of Independent or Employment Fellowship opportunities, with the assistance of OAAI, OHR, and OSP (for fellowships paid from sponsored projects);
- ensuring that the Academic Appointment Coordinator properly onboards Independent Fellows, including making them aware of their obligation to comply with SI policies applicable to fellows, such as, but not limited to, responsible research requirements and policies prohibiting discrimination and workplace harassment;
- consulting with the OAAI if they wish to develop new Independent Fellowship programs that comply with SI policies and procedures; and
- developing unit-supported enrichment activities for fellows.

Academic Appointment Coordinators are responsible for:

- ensuring that all Independent Fellowship programs and appointments made by their unit meet the standards set forth by the OAAI and this directive;
- completing all required procedures to provide Independent Fellows with appropriate access to unit facilities and SI network systems;
- ensuring that Independent Fellows complete any required workplace training (e.g., protection of minors, equal employment opportunity, etc.) and are apprised of training and requirements for the responsible and ethical conduct of research; and
- ensuring that Independent Fellows are made aware of their workplace protections and obligation to comply with policies prohibiting discrimination and workplace harassment.

Advisors are responsible for:

- maintaining eligibility to host fellows as defined by the OAAI;
- confirming, prior to the arrival of a fellow, that the fellow can be accommodated with office/research space, equipment, and other facility and access requirements;
- providing scholarly guidance, opportunities to enhance professional knowledge and skills, and practical support for fellows;
- ensuring that the fellow is acting consistently with the Fellowship Agreement, following legal requirements and other applicable standards for conducting research in the discipline, such as those for collecting, obtaining import permits, and using live animals or human subjects, and otherwise adhering to applicable SI policies; and
- reviewing and approving budget requests from the fellow.

Independent Fellows are responsible for:

- adhering to the policy set forth in this directive, including the standards of conduct (see Section 6);
- conducting their research or study in accordance with the requirements set forth in their Fellowship Agreement; and
- immediately consulting their advisor(s) if there is any doubt that an activity or planned activity is in compliance with their Fellowship Agreement, the *Fellowship Guide*, and/or SI policy.

The **Research Compliance Officer** shall provide any required training in the responsible and ethical conduct of research and any needed additional support for appointees (e.g., those conducting human subject or live animal research).

The **Export Compliance Officer** shall provide support to Independent Fellowship advisors and units regarding any export compliance control issues relating to foreign national fellows.

5. POLICY

The SI shall, under the leadership of the OAAI as the primary authority, establish requirements and criteria for all SI Independent Fellowship programs and ensure that those programs and appointments meet the established requirements and criteria. SI Independent Fellowships should not be established with the intention of leading to permanent employment at SI.

Each SI unit is allowed to maintain additional written guidelines, so long as they do not conflict with this directive. Units must consult with the OAAI before issuing their guidelines. Each SI unit shall consult this directive and consider the needs of the unit's programs and/or funding mechanisms to determine how to best design, advertise, and recruit for Independent Fellowship opportunities.

The OAAI shall approve all Independent Fellowship appointments. If an SI unit hosts a fellow without OAAI's approval, the OAAI cannot guarantee the fellow's ability to receive a stipend or remain an active member of the Smithsonian community.

An individual receiving an Independent Fellowship must agree to and comply with the terms of the Smithsonian's Fellowship Agreement and comply with the Rights and Responsibilities of all Fellows, as outlined in the [Fellowship Guide](#).

Location of Fellowships

Independent Fellowships are intended to be in-resident appointments at Smithsonian facilities and/or field sites. The OAAI will consider on a case-by-case basis requests for exceptions to the on-site requirement.

Open Competition

All Independent Fellowships should be openly competed. The competition can be run by the unit, the OAAI, or an external entity (such as the funder). If the competition is run by SI, the opportunity should be publicly posted on the OAAI's and/or the unit's website(s) for at least five (5) days. Those responsible for selecting candidates will review and consider all complete applications received.

Financial Support

All Independent Fellowships should be supported financially, either by SI or by a non-SI organization. **By January 1, 2025, all Independent Fellowships MUST be financially supported.** Stipends may be provided directly by the Smithsonian or directly by a non-SI organization to the Independent Fellow.

For Independent Fellows supported by SI, the total stipend value must be within the current maximums and minimums as identified by the OAAI. If a unit would like to offer an SI-supported opportunity at a stipend outside the parameters set by the OAAI, the unit must submit a request for a waiver from the OAAI.

For Independent Fellows, non-SI sources of financial support for their research may be permitted, provided that such support does not interfere with the Independent Fellow's ability to fulfill the commitments agreed to in the Fellowship Agreement or otherwise present a conflict of interest. Requests by Independent Fellows to receive additional (non-SI) financial support must be submitted for the OAAI's approval. Additional limitations and restrictions on income and related activities may apply to foreign nationals based on their immigration status.

Academic Requirements

Independent Fellows must have completed at least one collegiate degree (and units should consider whether an internship appointment is appropriate for undergraduate students). Specific degree requirements may be set for each Independent Fellowship program or opportunity.

Independent Fellowship opportunities should be categorized by the educational experience required from accredited academic institutions as follows:

- **Junior Fellow:** must have at least an Associates or Baccalaureate degree.
- **Graduate Fellow:** must be concurrently enrolled in a graduate academic program.
- **Predoctoral/All But Dissertation (ABD) Fellow:** must be concurrently enrolled in a doctoral degree-granting academic program.
- **Postdoctoral Fellow:** must be within five (5) years of the completion of a terminal degree.
- **Senior Fellow:** must have either (a) a terminal degree and be at least five (5) years beyond the completion of that degree or (b) extensive professional research experience in the field for which the individual is an Independent Fellow.

Fellowship Tenure

To align with standard academic and professional experience, Independent Fellows shall be appointed for a set period of time, up to a maximum determined by their fellowship category. All Independent Fellowships shall have the following maximum tenures:

- **Junior Fellow:** not more than one (1) year, which may be extended for an additional two (2) years for a total of not more than three (3) years.
- **Graduate Fellow:** not more than one (1) year, which may be extended for an additional two (2) years for a total of not more than three (3) years.

- **Predoctoral/ABD Fellow:** not more than one (1) year, which may be extended for an additional two (2) years for a total of not more than three (3) years.
- **Postdoctoral Fellow:** not more than three (3) years, which may be extended for an additional two (2) years for a total of not more than five (5) years.
- **Senior Fellow:** not more than one (1) year, which may be extended for an additional two (2) years for a total of not more than three (3) years.

Independent Fellowship appointments may be terminated at SI's discretion at any time if the Independent Fellow violates the Fellowship Agreement or otherwise fails to meet the requirements as defined in the *Fellowship Guide*.

See the subsection on "Foreign Nationals" for tenure of foreign nationals who are appointed to SI fellowships.

Additional Activities

Independent Fellows are expected to carry out the activities set forth in their proposal and the Fellowship Agreement. Independent Fellows are expected to engage in the intellectual community of the SI. They are encouraged to seek out professional development and training activities. Outside commitments that conflict with those activities may not be undertaken during the period of the fellowship.

Independent Fellows may not apply for grants in the name of the SI and may not be identified or serve as the sole Principal Investigator (PI) for sponsored projects (see [SD 321, Review and Submission of Proposals for Externally Funded Sponsored Projects](#)).

At the discretion of the Advisor(s), and provided an SI employee serves as the Intern's supervisor, an Independent Fellow may mentor but not supervise an SI Intern.

At the discretion of the Advisor(s), an Independent Fellow may simultaneously register and serve as an SI Volunteer during the period of one's Independent Fellowship appointment so long as the Volunteer position is hosted by a different department or unit than the one(s) hosting the Fellowship appointment (see [SD 208, Standards of Conduct Regarding Smithsonian Volunteers](#)).

No currently engaged employee or contractor of SI is eligible for, nor may the individual hold, an Independent Fellowship during the time of the individual's employment or contract. Independent Fellowships may not be offered to any person who has been employed by or was under contract to SI in the prior 12 months, without the prior approval of the OAAI.

Foreign Nationals

Except where specific programs or regulations require otherwise, Independent Fellows may hold any citizenship and residency. The following guidelines must be followed for Independent Fellows appointed at primary research locations within the United States, including Independent Fellowships with the Smithsonian Tropical Research Institute (STRI). Fellowships with primary research locations outside the United States will be subject to different requirements.

If a desired candidate for an Independent Fellowship is a foreign national, the OAAI and OGA must be notified prior to the individual's selection and, in the event of a desired extension, prior to the end date of the active appointment. The OGA will confirm that the Independent Fellow's immigration status is up to date and the status dates are coordinated with the fellow's appointment or extension. Independent Fellows may be required to provide additional documentation to determine their status while present in the United States.

All foreign nationals must hold valid status and work authorization for the duration of their Smithsonian fellowship appointment. Because foreign nationals will be limited to the amount of time for which they are eligible to hold valid status, their maximum duration of program participation might be shorter than the maximum outlined in the "Fellowship Tenure" subsection above.

Additional limitations and restrictions on income and related activities may apply to foreign nationals based on their visa type. Independent Fellows who are foreign nationals should confer with the OGA and OAAI prior to engaging in activities outside of their Independent Fellowship.

Intellectual Property

Independent Fellows may generate original research and related content (e.g., text, images, videos, graphs, databases, etc.) that is based on or derived from "Smithsonian Content" (e.g. the collections, resources, equipment, facilities, property, data [including but not limited to data generated by SI equipment], and staff expertise of the Smithsonian). Independent Fellows own copyright only in original research and related content that they create as Independent Fellows, subject to SI's ownership rights in the underlying Smithsonian Content.

When research is published, the Independent Fellow agrees to provide appropriate credit to SI and those who have collaborated with the fellow. Further, to the extent practicable and subject to a reasonable embargo period that may be imposed by the publisher, Independent Fellows agree to post for public access an electronic version of the final accepted manuscript or, with consent of the publisher, the final published version of their research.

Independent Fellows should understand that SI provides access to Smithsonian Content for a variety of purposes, including but not limited to research by SI staff, affiliated agency staff, other academic appointees, and the public. Independent Fellows must acknowledge that their access

to Smithsonian Content is not exclusive and that SI and others may use the same Smithsonian Content that was incorporated into their research, and any resulting publication, in a manner that results in original research and/or publication by others.

Externally supported Independent Fellows must protect against conflicts between their supporting organization's intellectual property terms and SI's policy; specifically, Independent Fellows shall not convey exclusive rights in their external support organization or any other organization or individual that would prevent the SI from exercising its right to publish Smithsonian Content in accordance with this policy.

6. INDEPENDENT FELLOWS' STANDARDS OF CONDUCT

Independent Fellows must comply with the following standards of conduct. Failure to comply with the following standards is cause for termination of the fellowship appointment.

An Independent Fellow must:

- follow legal requirements and other applicable standards for conducting research in the discipline, such as those for collecting, obtaining import permits, and using live animals or human subjects (see [SD 600](#), *Collections Management*; [SD 604](#), *Misconduct in Research*; [SD 605](#), *Animal Care and Use*; [SD 606](#), *Research Involving Human Subjects*; [SD 607](#), *Responsible and Ethical Conduct of Research Training*; [SD 608](#), *Financial Conflict of Interest for National Science Foundation [NSF]- and Public Health Service [PHS]-Sponsored Projects*; and [SD 611](#), *Export Compliance and Trade Sanctions Related to Research, Export and Museum Activities*);
- adhere to the funding source disclosure requirements in [SD 806](#), *Publishing at the Smithsonian Institution and by Smithsonian Employees*, and the funding source disclosure requirements otherwise applicable to SI staff in [SD 103](#), *Smithsonian Institution Standards of Conduct*, Section 9(b), when the fellow is publishing research findings under the SI affiliation;
- adhere to [SD 103](#), *Smithsonian Institution Standards of Conduct*, Section 13(c), and provide an annual and any ongoing disclosure required by the [SI Form 1085](#) if the fellow is a PI or co-PI on an SI sponsored project;
- adhere to applicable SI policy and/or written agreements between the fellow and the SI regarding ownership and use of intellectual property generated as a result of the fellowship, and be familiar with the provisions and processes set forth in all applicable directives, such as [SD 102](#), *Disclosing, Protecting, and Commercializing Inventions*, and [SD 609](#), *Digital Asset Access and Use*;
- adhere to [SD 118](#), *Privacy Policy*, to ensure the protection of personally identifiable information (PII) and [SD 119](#), *Privacy Breach Policy*, when reporting any suspected or confirmed breaches of PII;
- exhibit professional conduct and behavior, respect others, and comply with the expectations and policies set forth in [SD 225](#), *Anti-Harassment Policy*; [SD 217](#),

- *Workplace Violence Prevention Policy*; and the [SI Civil Handbook](#). Also, as noted in [SD 214, Equal Employment Opportunity Program](#), the Smithsonian strives to provide a working environment that is free from discrimination and harassment for employees and affiliated persons. Therefore, fellows are also responsible for cooperating in the enforcement of SD 214;
- be aware of and guided by the generally accepted professional standards and codes of ethics applicable in the fellow's professional field(s);
- if granted access to collections, whether in the host unit or elsewhere, be aware of and adhere to the unit's collections management policy and [SD 600, Collections Management](#). Access to and use of collections must be approved in advance by the appropriate unit staff employee in accordance with established policies and procedures;
- if working directly with SI collections, disclose to an Advisor any personal activity that may create or seem to create conflicts of interest, such as collecting or dealing in similar objects, materials, or specimens;
- adhere to [SD 421, Mobile Asset Fleet Management](#), which provides that only authorized operators may drive an SI motor vehicle or off-road equipment;
- adhere to the rules set by the Smithsonian Institution Libraries and Archives (SLA) and the Harvard-Smithsonian Center for Astrophysics library when using their resources and facilities; and
- adhere to [SD 120, Scientific Diving Policy](#), when applicable.

In addition to complying with the above standards, an Independent Fellow must not:

- misrepresent one's relationship with the SI, particularly in any way representing oneself as an employee of the SI;
- directly or indirectly profit from, or permit others to profit from, information obtained through the academic appointment that is or would be unavailable to external scholars or the general public;
- solicit or accept any gift that is or appears to be offered because the fellow holds an academic appointment or may have influence within the SI;
- use official SI letterhead or similar materials or mailing privileges;
- solicit or promote the sale of any goods or services on SI premises through the use of SI resources or facilities, including email; and
- reproduce copyrighted material (owned by the SI or a third party) in the absence of specific approval to do so from the rights-holder(s), unless permitted by fair use.

An Independent Fellow who becomes aware of any facts or circumstances giving rise to conflicts or non-compliance with the standards outlined in this section must immediately disclose such facts and circumstances to the fellow's Advisor(s). If there is any doubt that an activity or planned activity is in compliance, fellows should immediately seek the advice of their Advisor(s). Should the fellow's Advisor be the individual giving rise to conflicts or non-

compliance, the fellow should seek advice from SI Civil, the Smithsonian Ombuds, or the Unit Director.

The Smithsonian is committed to maintaining a work environment that is free from discrimination and harassment and to ensuring that all employees and [affiliated persons](#), including Independent Fellows, are treated equitably. An environment where people feel welcome, respected, and valued is necessary for all individuals to contribute to their fullest potential. The Smithsonian will not tolerate discriminatory or harassing behavior or retaliation against any Smithsonian employee or affiliated person. The Smithsonian has important resources that are available to all academic appointees, such as [SI Civil](#) to report harassing conduct, the [Office of Equal Employment and Supplier Diversity \(OEESD\)](#) to address EEO concerns, and the [Smithsonian Ombuds](#) to speak to someone confidentially.

Additionally, fellows must cooperate in the enforcement of the [Equal Employment Opportunity](#) policy as set forth in [SD 214, Equal Employment Opportunity Program](#), and the [Equal Opportunity Handbook](#).

7. REFERENCES

Smithsonian staff (Academic Appointment Coordinators, Advisors, etc.) can find useful information to implement their fellowship programs in the following documents:

- OAAI [Fellowships webpages](#)
- [SD 321](#), *Review and Submission of Proposals for Externally Funded Sponsored Projects* and the [Sponsored Projects Handbook](#) (OSP)
- [SD 608](#), *Financial Conflict of Interest for National Science Foundation and Public Health Service Sponsored Projects*

Independent Fellows can find additional information on their rights and responsibilities in the [Fellowship Guide on Appointments at Smithsonian Institution](#), published by OAAI.

All Independent Fellows are subject to the following: [SD 103](#), *Smithsonian Institution Standards of Conduct*; [SD 118](#), *Privacy Policy*; [SD 119](#), *Privacy Breach Policy*; [SD 214](#), *Equal Employment Opportunity Program*; [SD 225](#), *Anti-Harassment Policy*; [SD 217](#), *Workplace Violence Prevention Policy*; and the [SI Civil Handbook](#).

Additionally, depending on their activities, some Independent Fellows may be subject to: [SD 102](#), *Disclosing, Protecting, and Commercializing Inventions*; [SD 120](#), *Scientific Diving Policy*; [SD 124](#), *Protection of Minors*; [SD 604](#), *Misconduct in Research*; [SD 605](#), *Animal Care and Use*; [SD 606](#), *Research Involving Human Subjects*; [SD 607](#), *Responsible and Ethical Conduct of Research Training*; [SD 609](#), *Digital Asset Access and Use*; [SD 611](#), *Export Compliance and Trade Sanctions Related to Research, Export and Museum Activities*; and [SD 806](#), *Publishing at the Smithsonian Institution and by Smithsonian Employees*.

The following directives govern other appointments and activities:

- [SD 205](#), *Smithsonian Institution Research Associates*
- [SD 208](#), *Standards of Conduct Regarding Smithsonian Volunteers*
- [SD 709](#), *Smithsonian Institution Interns*

SUPERSEDES:	SD 701, June 13, 2019.
INQUIRIES:	Office of Academic Appointments and Internships (OAAI).
RETENTION:	Indefinite. Subject to review for currency 36 months from date of issue.
