Policy on Tobacco Industry Funding of Research
University of California, San Francisco
“DRAFT”

I. General Policy: In accordance with University of California Regents Resolution RE-89, the University of California, San Francisco will not submit any new research proposals to tobacco industry sponsors unless/until the proposals have undergone internal review and have been approved by the Chancellor, as required by RE-89.

Researchers intending to seek funding from a sponsor that may be considered to be part of the tobacco industry should contact the Office of Sponsored Research for guidance regarding the process for review and approval, and should do so well in advance of any submission deadline.

II. Background and Implementation: On September 20, 2007, The Regents of the University of California approved RE-89, a resolution that requires special review, approval and reporting procedures related to University submission of research proposals seeking funding from tobacco industry sponsors. The full text of RE-89 is available online at: http://www.universityofcalifornia.edu/regents/aar/sepf.pdf.

A. Exhortation to Researchers: RE-89 exhorts University researchers to:

1. Consider carefully whether to accept research funding from the tobacco industry (and whether their research might be better served by seeking funding from alternate sources).

2. Exercise the utmost care in assuring that their research (including research carried out with tobacco industry funding) adheres to the highest scientific and ethical standards. This includes being particularly vigilant about not allowing any funder to direct or control the outcome of the research or the dissemination of its results.

B. Definition of tobacco industry/Scope of policy: RE-89 defines “tobacco industry” as “entities whose principal business is the manufacture and sale of tobacco products, and agencies that are substantially controlled by or acting on behalf of such entities.” The special review and approval requirements apply only to tobacco industry sponsors of research, and only to proposals submitted after September 2007 (new proposals and/or competitive renewals of current grants). The campus Office of Research (working with the UCOP Office of Research) can provide guidance as needed in interpreting/applying this definition.

C. Review/Approval Requirements: As required by RE-89, the review and approval process for submission of proposals for research funding from the tobacco industry will include the following elements:
1. **Review of all such proposals by a scientific peer review committee designated by the Vice Chancellor of Academic Affairs for that purpose.**

   a. The scientific review committee will be composed of at least three faculty members with expertise in areas of science relevant to the proposal being submitted who will be charged with the assessment of the broad ethical questions and/or implications of the research plan; assessment of proposed study design has a sound methodology and whether the design allows the researcher to reach objective and scientifically valid conclusions.

   b. For each proposal it reviews, the scientific review committee will produce a written report including a recommendation to the Chancellor as to whether the proposal should be approved for submission, and/or whether any changes should be made to the proposal prior to submission, along with the rationale for the committee’s recommendation.

2. **Chancellorial approval prior to submission of any proposal to seek funding from the tobacco industry.**

   a. In deciding whether to approve submission of a proposal, the Chancellor will take into account the written review of the scientific peer review committee and any advice issued by the campus conflict of interest committee, in cases where, under existing policy requirements, the research has disclosed a financial interest in the research sponsor.

3. **Issuance of a written Chancellorial determination approving or disapproving submission of a proposal to seek funding from a tobacco industry sponsor – including a rationale of the determination – with a copy to be provided to the researcher, the President, and The Regents.**

4. **An annual report from the President of the University to The Regents summarizing the number of proposals submitted to a scientific review committee under RE-89, the number approved, and the number funded, along with a description or abstract of each proposal.**
University of California, San Francisco
Policy Model for Implementation
Tobacco Industry Funding Review Process Flow Chart
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Determination that sponsor is a “tobacco industry” entity
(Researcher in consultation with the Contracts & Grants Office)
↓
Vice Provost of Academic Affairs designates a scientific review committee composed of faculty with appropriate scientific expertise
(Academic Senate Committee on Research can serve this purpose)
↓
Researcher submits draft proposal to peer review committee 30 days prior to industry sponsor deadline
(Accompanied by a description/abstract of the proposal)
↓
Peer review committee reviews proposal
(Committee assesses whether proposed study uses sound methodology and appears designed to allow the Researcher to reach objective and scientifically valid conclusions. The Committee will provide a written report to the Chancellor within seven (7) days of completing the scientific review)
↓
(If required, Researcher revises proposal based on recommendation of the Committee and then submits revised proposal to the Chancellor for approval)
↓
Peer review committee completes written review of proposal
(Committee recommends either: a. Chancellorial approval; b. revisions to proposal prior to approval; or c. denial of Chancellorial approval. The Committee provides the written report to both the Chancellor and the Researcher.)
↓
Chancellor Approves/Declines to Approve Submission of Proposal to Tobacco Industry Sponsor
(And conveys the written decision to researcher with copy to the President and the Secretary and the Chief of Staff to The Regents along with a copy of the Committee’s written report and proposal description/abstract)
↓
If approved by Chancellor
Campus submits proposal to tobacco industry sponsor
↓
Campuses report funding outcomes to Office of the President
(UCSF report to UCOP on which proposals are funded)
↓
President submits annual report to Regents
(Annual report summarizes the number of proposals submitted to the scientific review committee, the number approved, and the number funded, along with a description or abstract of each proposal)