

Research Circular No. D.8.

ISSUED: SEPTEMBER, 2008

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UCSB OFFICE OF RESEARCH

SPONSORED PROJECTS POLICY

IMPLEMENTATION OF REGENTAL POLICY ON RESEARCH FUNDED BY THE TOBACCO INDUSTRY

I. References

- A. Regental Resolution 89 ("RE-89"), September 20, 2007
- B. Letter dated February 5, 2008 to Chancellors from President Dynes

II. Background

On September 20, 2007, The Regents of the University of California adopted RE-89, a Regental resolution that requires special review, approval and reporting procedures for research proposals seeking funding from tobacco industry sponsors. The full text of RE-89 is available online at: <http://www.universityofcalifornia.edu/regents/aar/sep07.pdf>.

III. Scope

All proposals (either new or renewals) submitted after September 2007 that seek funding from tobacco industry sponsors, as defined below, are subject to the RE-89 special review, approval, and reporting requirements regardless of the funding mechanism (e.g., grant, contract, gift, or research services agreement).

IV. Definitions

Tobacco Industry: 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 Office of Research can provide guidance, as needed, in interpreting this definition. Also see Appendix, Implementation of RE-89: List of Sponsors Potentially Affiliated with the Tobacco Industry.

V. General Policy

In accordance with University of California Regents Resolution RE-89, the University of California, Santa Barbara ("UCSB") will require that research proposals to tobacco industry sponsors, whether such research is to be funded by a grant, contract, gift or research services agreement, undergo campus review and approval as required by RE-89. Researchers that intend to seek funding from a sponsor that may be considered to be part of the tobacco industry should contact the Office of Research for guidance regarding the process for review and approval, and should do so well in advance of any submission deadline.

VI. Responsibilities

- A. Researchers are urged 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) and
 - 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 to prevent any sponsor from directing or controlling the outcome of the research or the dissemination of its results.
- B. The Office of Research will provide guidance:
 - 1. Regarding the review and approval process and

2. On interpreting definitions and the application of this policy.
- C. The Vice Chancellor for Research will:
1. Conduct campus reviews consistent with the requirements of RE-89 and
 2. Serve as the approval authority for proposals within the scope of this policy.

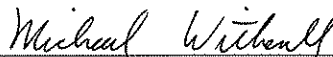
VII. Review, Approval, and Reporting Requirements

As required by RE-89, the review and approval process for submissions 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 for Research 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, and will advise the Vice Chancellor for Research regarding whether the proposed study uses sound methodology and whether it appears designed to allow 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 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. In deciding whether to approve submission of a proposal, the Vice Chancellor for Research will consider: (a) the written review of the scientific peer review committee, (b) any recommendation issued by the campus conflict of interest committee, in cases where, under existing policy requirements, the researcher has disclosed a financial interest in the research sponsor, and (c) the recommendation of the Vice Chancellor Institutional Advancement, when the source of the proposed funding is a gift.
3. The Vice Chancellor for Research will issue a written determination approving or disapproving submission of a proposal to seek funding from a tobacco industry sponsor. A copy of the determination will be provided to the researcher, appropriate dean, the Chancellor, the University of California President, and The Regents.
4. The Office of Research will retain copies of the determinations for the purposes of responding to annual reporting requests from the Office of the President.

Appendix

Implementation of RE-89, List of Sponsors Potentially Affiliated with the Tobacco Industry



Michael Witherell
Vice Chancellor for Research

cc: Chancellor Yang
Vice Chancellor Wiemann
Meta Clow, Administrative Services

Application of RE-89: What companies (potential research sponsors) are covered?

On February 5, 2008, President Dynes sent a letter to Chancellors --

http://www.ucop.edu/research/policies/documents/review_approval_re89.pdf

-- asking them to implement RE-89, a Regental resolution requiring adoption of special review, approval and reporting procedures for proposals to obtain research funding from the tobacco industry. The President's letter enclosed a model policy for campuses to consider adopting, which included the following definition of "tobacco industry," drawn from RE-89:

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.

UCOP does not maintain a comprehensive list of companies that are part of the "tobacco industry" (some companies, like RJ Reynolds and Philip Morris, are readily identified as "tobacco companies;" others, like the former Center for Indoor Air Research, may have an association with the tobacco industry that is not immediately apparent). However, to assist campuses in implementing RE-89, the Office of Research compiled the following list of companies that are or that have in the past been identified with the tobacco industry. *Please note that inclusion on this list does not definitively mean that a company falls under the definition of tobacco industry included in RE-89, nor does the fact that a company does not appear on this list mean that it would not be included within the scope of RE-89.* If campuses have questions about a particular sponsor, they may consult with UCOP's Office of Research for assistance in determining whether/how RE-89 applies.

Altadis Group
AllianceOne International (formerly Dimon Inc.)
American Tobacco
Altria Group (Parent company of Philip Morris)
British American Tobacco Company, Ltd
Brown & Williamson Tobacco Corp.
Center for Indoor Air Research (No longer in existence)
China National Tobacco
The Council for Tobacco Research (No longer in existence)
Dimon Incorporated (No longer in existence)
~~Kraft Foods~~ [Kraft was recently spun off from Altria, and so it appears that Kraft would not be covered by the RE-89 policy]
Gallaher Group
Imperial Tobacco
Japan Tobacco Inc

Liggett & Brooke Group
Liggett & Myers, Inc.
Loews Corporation
Lorillard Tobacco Co., Inc.
Philip Morris
ResearchAmerican Tobacco Corporation
RJ Reynolds
RJR Nabisco, Inc. [No longer in existence; now Nabisco Holdings Corp. Unclear if there is now any tobacco relationship that would trigger RE-89 provisions].
Smokeless Tobacco Council
Standard Commercial Corporation
Star Scientific, Inc. (Formerly Star Tobacco and Pharmaceuticals)
Tobacco Associates
Tobacco Industry Research Committee
Tobacco Institute, Inc.
United States Tobacco Company
Universal Leaf Tobacco Co.
Vector Group