



Accepting Funds from the Tobacco Industry:

CDC Guidance for Collaboration with the Private Sector

Background

Recently, the tobacco industry has approached state and local agencies with proposals to financially support the implementation of youth tobacco prevention programs. Decisions about whether to accept money directly from the tobacco industry to implement youth tobacco prevention programs have sparked controversy and divisiveness among those committed to preventing tobacco use. Several constituents have contacted CDC to request its opinions as they consider these proposals.

Decisions about collaborative relationships with private sector partners must be made at the level of the proposed relationship, i.e., either at the national, state, or local level. CDC encourages national, state, and local agencies to consider developing a set of guiding principles for forming collaborative arrangements with outside entities. Agencies should work together and use existing partnerships with national, state, and local education and health agencies, community-based organizations, universities, and others to fully consider and discuss the positive and negative outcomes that may occur as a result of any proposed partnership.

Criteria

The CDC has developed its own criteria for collaborating with the private sector that might be of assistance to national, state and local agencies. These criteria were developed to provide guidance to CDC's Centers, Institutes and Offices in assessing the appropriateness of entering into a partnership with an outside agency, organization, or industry. These criteria include:

- **Be clear how the potential collaboration fits within its overall mission and priorities and the private partner's mission and priorities.**

For example,

- Why does the organization want to work with the agency?
 - How does the project relate to the organization's mission and goals?
 - Will the potential collaboration have a reasonably large impact relative to the resource required?
 - Will the project be designed so that it is scientifically defensible?
- **Assess the effect of the private partner's products or services on health and whether these products or services are compatible with your mission;**
 - **Assess the behavior of the private partner in conducting business and determine whether the partner's behavior is consistent with your mission and the principles guiding private sector collaboration.**

Questions regarding a variety of aspects about the organization's behavior should be asked. For example,

- What is the history of the organization's previous collaborations with you or another public health agency?



- Do the organization and you adhere to similar scientific, ethical, and legal principles and practices?
 - Will the organization comply with your policy and regulations?
 - What are the organization's practices in promoting its products or services and its interests?
 - Could you stand behind the organization's practices?
 - Does the organization's motivation for pursuing the collaboration fit with your mission and priorities?
 - How has the organization behaved in the past when its product or service was found to be harmful?
- **Assess not only the specific area of mutual interest but the public impact of the partner's broad public mission and image.**
- For highly controversial issues, multiple collaborators should be sought that represent a broad spectrum of opinions and interests. For example, the overall perception of the partner will inevitably affect the public's view of the appropriateness of the collaboration.
- **Avoid participating in indirect collaborations unless you would also participate in a direct relationship with the partners.**
- For example, indirect relationships should not be established solely to distance you from a specific partner, thereby avoiding an external perception of an inappropriate collaboration. An indirect relationship often provides relatively little protection from the perception that the agency is inappropriately working with a private organization. This is especially true when a third party is the intermediary between the agency and a single organization.
- **Be willing to make public the existence of a collaboration.**
- **Ensure that any stand taken on issues of public health importance is supported by the interests of the partner, the public, and the agency.**
- This responsibility must be borne out in fact and in appearance because of the importance of the public's trust in the agency.
- **No appearance or fact of personal gain should result from the collaboration.**
- This responsibility becomes critical when collaborations are with a single organization or concern controversial subjects.
- **Assess how its name and participation in a collaborative project will be used and whether such usage is consistent with the agency's public role.**
- **Assess whether the partner will attempt to use its name to endorse a product.**
- **A formal review and advisory process should be established for examining potential collaborations according to the principles, criteria, and recommendations described in this document.**

For further information, please refer to CDC's *Guidance for Collaboration with the Private Sector*. This document identifies principles that underlie the public health mission and sets forth guidance for evaluating potential collaborations. Electronic copies of the document are available at: www.cdc.gov/od/foia/policies/collabor.htm.