



## Public-Private Partnerships and Conflict of Interest Guidelines

### **What is the CDC Foundation's relationship with CDC?**

The CDC Foundation is an independent, nonprofit organization that forges partnerships between the Centers for Disease Control and Prevention (CDC) and private sector organizations. Classified as a 501(c)(3) public charity, the Foundation is the sole entity authorized by Congress to raise private funds in support of the mission and work of CDC. To ensure that the Foundation remains independent from CDC, its founding legislation prohibits the CDC director or other CDC employees from sitting on the Foundation board. However, Foundation leaders work closely with CDC leaders and scientists to ensure that the CDC Foundation's overall strategic direction and portfolio of programs and activities have the greatest possible impact for CDC and public health.

### **What kinds of partnerships does the CDC Foundation facilitate?**

Partnerships forged by the CDC Foundation include traditional philanthropic donor/grantee relationships, collaborative alliances between CDC and a single private-sector organization, broad multi-partner initiatives that may include more than one funding stream, and research collaborations that leverage CDC's and partners' expertise to achieve mutual public health objectives.

### **How does the CDC Foundation add value for CDC?**

The CDC Foundation helps CDC pursue innovative ideas that might not be possible without the support of external partners. The support needed is most often funding, but also can include expertise, information or introductions to additional partners. CDC Foundation partnerships help CDC launch new programs, expand existing programs that show promise, or establish a proof of concept through a pilot project before scaling it up. In each partnership, external support gives CDC the flexibility to quickly and effectively connect with other experts, information and technology needed to address a public health challenge.

### **How are programs with external partners initiated?**

Many partnership ideas originate from CDC staff who see the value in collaborating with partners to extend CDC's public health priorities. Other times, a private-sector organization has specific public health interests that are also of interest to CDC as part of its public health agenda.

While each partnership is unique, most CDC Foundation programs begin with an exploratory conversation, originating either with experts at CDC or with representatives of potential partner organizations. CDC Foundation advancement staff members help guide the conversation toward areas of mutual interests—where a public health priority to both parties could be addressed by combining resources and expertise. [View the CDC Foundation's Partnership Cycle](#)

### **Specifically, how do you select and review projects?**

CDC Foundation programs begin with a program concept outline developed by an expert or team of experts at CDC. When project ideas are generated inside of CDC, the principal investigator or investigators prepare the concept outline. When an idea for partnership comes from outside of CDC, the CDC Foundation facilitates exploratory conversations to determine if CDC is interested in pursuing the project. If mutual goals are identified, the appropriate CDC scientist then prepares a program concept outline. If CDC declines, the Foundation does not pursue the partnership. The Foundation also declines partnership opportunities when the partner has unacceptable expectations.

When the program concept outline is complete, the CDC investigator sends it through a review process at CDC. CDC leaders at progressively higher levels in the agency review the program concept outline. They each evaluate how the program supports CDC's mission and priorities, affects other agency programs, and adheres to federal policies on public-private partnerships and conflicts of interest. At any point in this review process, questions and concerns may be raised, the concept outline may be sent back to the lead scientist for additional information or revision, or the concept may be rejected. Once the program concept has been through the complete review process at CDC, ending with final approval by a representative in CDC's Office of the Director, it is submitted to the CDC Foundation's executive team for review. The Foundation's executive team evaluates the program concept outline to ensure that:

- ideas have been reviewed and approved by CDC's Office of the Director
- the CDC Foundation has the capacity to successfully attract resources for and subsequently manage the program
- the program adheres to CDC's independence and objectivity of scientific judgment
- the program scope of work, goals and potential partners represent no conflict-of-interest for the CDC Foundation, its staff or board of directors
- the proposed activity does not require exclusivity; other partners may join at any time
- no product endorsement of any kind is involved in the activity, and outcomes of the activity are not intended for direct monetary benefit for the partner
- CDC maintains final judgment on all matters of scientific findings, facts or recommendations

If the CDC Foundation executive team accepts the program concept outline, the Foundation's advancement department begins the formal process of seeking funding. The executive team may also request additional information before making a decision, or they may reject the program concept outline.

### **How do you ensure that a project does not present any conflicts of interest for CDC and the CDC Foundation?**

The CDC Foundation serves as one vehicle for CDC to partner with the private sector, but we rely on CDC's governance and policies and its high standards of scientific integrity to guide every partnership we build.

Projects facilitated by the CDC Foundation go through a rigorous review and approval process through both the CDC Foundation and CDC leadership at multiple levels to ensure that the project 1) aligns with CDC's mission and priorities, 2) has appropriate research methodologies, 3) maintains CDC's research independence and 4) does not present any conflicts of interest.

CDC has a gift acceptance policy that each program must adhere to. This policy applies to gifts provided from outside of the agency, including funds provided by the CDC Foundation. CDC also developed [public-private partnership guiding principles](#) to help staff navigate internal policies and procedures to build partnerships that maximize health impact.

The CDC Foundation also has guidelines for partner collaborations that are considered when evaluating project concepts. [View the CDC Foundation's Guiding Principles for Collaboration](#)

### **What policies guide CDC's use of private funds?**

CDC must adhere to its gift acceptance policy. Each program in the agency must follow the policy and its established procedures for the acceptance, acknowledgement and administration of gifts.

CDC must evaluate when a gift offered by a private entity, e.g., company, foundation, enterprise, etc., may create a conflict of interest or may be from a prohibited source. A prohibited source is any individual or entity that is seeking official action by CDC; does business or seeks to do business with CDC; conducts activities regulated by CDC; has interests that may be substantially affected by performance or nonperformance of an employee's official duties; benefits from work performed by CDC, such that they can use it to promote their business; or is an organization where a majority of its members are described in Section VI. I. 2 (5 C.F.R. Section 2635.203(d)). The fact that a potential donor is a prohibited source does not necessarily mean that a proposed gift may not be accepted; only that it must be carefully evaluated for possible conflicts of interest.

CDC's statutory authority to accept gifts does allow some discretion in the expenditure of private funds. Generally, gifts are not subject to all of the restrictions applicable to direct appropriations from the U.S. Congress. They are, however, still considered "public funds." Gift funds can only be used in furtherance of CDC's stated mission.

### **How do you ensure that CDC's work is not influenced by a single funder or group of funders?**

Because CDC is a federal agency, all scientific findings resulting from CDC research are available to the public and open to the broader scientific community for review. Funding for CDC's work provided through the CDC Foundation is not contingent on the outcomes of research or other scientific activity being favorable to one or more partners. The majority of the Foundation's programs involve use of existing data or dissemination of key messages to extend CDC's reach beyond activities specifically included in federal appropriations. When the CDC Foundation accepts funding, we execute a legal agreement with partners stating that CDC is responsible for the control of the content.

### **What are your sources of funding?**

As a private 501(c)(3) public charity, the CDC Foundation receives charitable contributions and philanthropic grants from individuals, foundations, corporations, universities, NGOs and other organizations to advance the work of the Centers for Disease Control and Prevention. Unlike many large foundations, the CDC Foundation does not have a large endowment to support our activities. The CDC Foundation builds an administrative fee, typically 16 percent, into each grant or agreement to support administrative costs. Through Congressional authorization, CDC also contributes some funds to the Foundation annually to help cover operational costs. ([View the CDC Foundation's Donor Reports and Financials.](#)) For eight consecutive years, the CDC Foundation has received the highest, 4-star rating from Charity Navigator, which annually assesses fiscal responsibility and financial health of charitable organizations. Only 1 percent of charities rated have received eight consecutive 4-star evaluations.