

Policy Title: UW Medicine Advancement Policy on Crowdfunding

Policy Number:

Superseded Policy(ies) or Entity Policy: (as applicable)

Date Established: 3/3/15

Date Effective: 4/1/15

Dates Revised:

Next Review Date:

I. Purpose and Scope

The purpose of this policy is to assist and guide UW Medicine workforce members, including School of Medicine faculty, staff, trainees and students and UW Medicine hospital and clinic healthcare professionals and staff, in using crowdfunding to fund their University-related or other UW Medicine entity-related research and other activities.

II. Background

Crowdfunding is the practice of funding a project or venture by raising small amounts of money from a large number of people, typically via the Internet. It can be used to support a wide variety of activities, including scientific research.

Multiple crowdfunding websites (companies) currently exist to facilitate funding of these activities. Crowdfunding companies are generally for-profit and charge a fee.

III. Policy

It is the policy of UW Medicine to support viable crowdfunding efforts by its workforce members to fund their University-related research and activities consistent with the University of Washington Advancement Crowdfunding Guidelines (applicable to UW employees) and within the scope and parameters listed below:

1. Crowdfunding is considered a form of fundraising and is considered a gift under GIM 34: <http://www.washington.edu/research/osp/gim/gim34.html>. As such, all crowdfunding activities must be reviewed and approved by the UW Medicine Advancement office.
2. The project leader of the activity to be crowdfunded must be a UW Medicine workforce member, which includes trainees and students.

3. Before being submitted to the UW Medicine Advancement office, the project must be approved in writing by the workforce member's department chair or division head or designee, department/unit head or your respective UW Medicine entity leadership, as applicable.

4. The funds received from crowdfunding must be placed in a UW or UW Medicine entity gift budget. When the funds are placed in a UW or UW Medicine entity budget, they become the property of the University or the respective entity. If the workforce member leaves the University, these funds remain the property of the University/entity.

5. It is the responsibility of the project leader to understand and comply with all legal and regulatory requirements applicable to crowdfunding activities. These general requirements include the following:

a. RCW Chapter 42.52 Ethics in Public Service (State employees only). Your activities and relationship with the crowdfunding company must comply with the state ethics law, RCW Chapter 42.52, and the University's Conflict of Interest Policy, Executive Order No. 32: <http://www.washington.edu/admin/rules/policies/PO/EO32.html>.

You cannot have a financial interest in the crowdfunding company or any interest that is in conflict with the discharge of your University duties. You cannot accept gifts or anything of economic value from the crowdfunding company if it could be reasonably expected that the gift or favor would influence your work-related actions with respect to the company. You may not accept a gift from the company if the value of the gift exceeds \$50 in total. You cannot offer a perk, incentive or gift for donations.

b. UW School of Medicine Policy on Potential Financial Conflicts of Interest with Commercial or Non-profit Entities. For UW School of Medicine faculty members, your crowdfunding activities cannot violate the UW School of Medicine's Conflict of Interest Policy. For example, you cannot engage in any promotional or marketing activities for the crowdfunding company, including testimonials. UW faculty cannot be perceived as endorsing a particular company, product or website. UW faculty also cannot accept gifts or anything of monetary value from the company that could be perceived as a reward or inducement to do additional business with that company. <http://www.uwmedicine.org/about/policies/conflict-interest>

c. Institution's Conflict of Interest Policy. Your crowdfunding activities must comply with your respective institution's conflict of interest or integrity at work and ethics policies. Workforce members cannot accept gifts or anything of monetary value that could be perceived as a reward or inducement to do additional business with that company. See, for example, http://depts.washington.edu/comply/docs/UWMC_Integrity_at_Work.pdf.

Donations or gifts from a commercial entity or industry vendor such as pharmaceutical, device or equipment manufacturers cannot be accepted as part of a crowdfunding fundraising campaign.

Approved crowdfunding sites are required to place a disclaimer that will ask the donor to confirm that they will receive no benefits, tangible or intangible, from their contribution.

d. UW Medicine Brand Guidelines. The use of the UW Medicine name and any photo or video use must conform to UW Medicine brand guidelines; if your project is approved, there will be a brand and compliance review of your text. The crowdfunding company cannot use any UW or UW Medicine brand name or logo to promote its business (also see e, below). UW Medicine should not be perceived as—or appear to be—promoting or endorsing the company, product or website.

e. University Trademarks and Licensing. You cannot use any UW or UW Medicine logos. You may not use UW symbols, or UW names, such as “Huskies,” “Dawgs,” “University of Washington,” or “UDub” without the prior approval of the UW trademark licensing program. <http://depts.washington.edu/uwlogos/departments-programs>

e. Procurement Services. You must follow purchasing requirements for goods and services required for your project. <http://f2.washington.edu/fm/ps/how-to-buy>

f. Executive Order No. 36 (Patent and Invention Policy). All inventions that come about as a result of your project must be reported to CoMotion (formerly the Center for Commercialization or C4C). The University has an interest in any discoveries or inventions since you are performing the project as part of your UW duties. If the crowdfunding company desires any interest in your project, you should consult with the Office of Sponsored Programs and/or CoMotion. <http://www.washington.edu/admin/rules/policies/PO/EO36.html>

6. If the project involves research, the research proposal and your associated crowdfunding activities must also comply with the following laws, rules, regulations and policies that apply to research, including, but not limited to, the following:

a. 45 CFR Part 46, Federal Policy for the Protection of Human Subjects. If your project involves human subjects, you must obtain the appropriate review by the UW Human Subjects Division and IRB approval as applicable. Also, information about research subjects is confidential and cannot be shared with the company or public. <http://www.washington.edu/research/hsd>

b. Health Information Portability and Accountability Act (HIPAA). If your project involves patient information, patient identification (by name or through appearance in photography or video) or protected health information (PHI), you must meet privacy and security requirements specified in HIPAA and UW Medicine Privacy and Security policies in your dealings with the company and promoting your project. You cannot use and/or share patient information/identification without the patient’s authorization. You may not send crowdfunding appeals to patient populations. See UW Medicine Privacy Policies: <http://depts.washington.edu/comply/privacy.shtml> and UW Medicine Security Policies: <https://security.uwmedicine.org/guidance/policy/default.asp>.

c. Animal Welfare Act. If your project involves the use of live vertebrate animals, your project must be reviewed as required by federal law and University policy by the Institutional Animal Care and Use Committee (IACUC). See Office of Animal Welfare Submission and Review Process: <http://depts.washington.edu/oawhome/submission-review-process>.

d. NIH Grants Policy Statement and Federal Grant/Contract Award Requirements (only applicable if your project is already partially funded by a federal grant, contract or award or you are applying for this type of award).

There are a number of federal funding sources, such as the Department of Health and Human Services, which includes the Public Health Service and the National Institutes of Health, the Department of Defense and the National Science Foundation. You are responsible for ensuring that your crowdfunded project complies with the terms of your grant or contract award. See, for example, NIH Grants Policy Statement Part II, Subpart A, 8 Administrative Requirements: http://grants.nih.gov/grants/policy/nihgps_2012. If you are a NRSA (F32 or T32) or NSF fellow or the project involves such a fellow, the project must also be unrelated to the research being done under the fellowship.

e. GIM 10 UW Financial Conflict of Interest Policy. GIM 10 applies to your research regardless of funding source, and you must submit your financial interest disclosure in the Financial Interest Disclosure System (FIDS) in accordance with that policy notwithstanding the fact the project is crowdfunded. <http://www.washington.edu/research/osp/gim/gim10.html>

IV. Process

UW Medicine has established a process that provides for a review and vetting of the project to enhance its likelihood of success and compliance with various regulations. The process begins with your completing the crowdfunding project review form and submitting it your department chair, division head or your respective UW Medicine entity leadership for review and approval. After you have received this approval, send the completed and signed form to UW Medicine Advancement at Box 358045 or writemed@uw.edu. If the project is undertaken by hospital or clinic-related staff or trainees, the project will also be reviewed by the chief health system officer.

The project leader will be notified within 10 business days if the project has been approved for crowdfunding, a process based partially on compliance and partially on the viability of the project. If approved, the project may then proceed to the proposal stage. You will work with UW Medicine Advancement to prepare and submit your project to the most appropriate crowdfunding platform. This may include materials to be placed on the crowdfunding website, such as photos, videos and an abstract or description of the project.

Your project and materials created will also undergo compliance review. UW Medicine Advancement and the UW School of Medicine Business Unit (Compliance) for School of Medicine workforce members or UW Medicine Compliance for medical center staff must have an opportunity to review the final project and all associated communications prior to submission.

Once your project materials are created and approved, they may be submitted to one of UW Medicine Advancement's preferred crowdfunding companies. Before your project is submitted to one of these companies, you must notify your department director or administrator so that a budget can be created to accept the funds. For a current list of preferred crowdfunding companies and sites, please contact writemed@uw.edu.

If the project is accepted by the crowdfunding company, it will be posted and the project launched. Note that it will be necessary for the project leader to submit project updates and other information via the company website or other social media; in other words, the project leader manages the day-to-day aspects of the campaign. If the project is successfully funded, the donations must be properly recorded and acknowledged. UW Medicine Advancement will work with the project leader to record and acknowledge these donations and deposit the funds in the appropriate UW budget.

UW Medicine Advancement has prepared a booklet, "Crowdfunding: Your Introduction," that explains the complete process in more detail. You may obtain a copy of this publication by contacting writemed@uw.edu.

Approvals

_____ Ruth Mahan _____

___3/3/2015_____

Approved By Signature

Date