DONATION GUIDELINES

As a non-profit organization, Project Inform is able to fulfill its mission and provide services, free of charge, because of its fundraising and outreach efforts. Project Inform receives funding from diverse sources, including individuals, foundations, health care-related corporations, and the government. Project Inform strives to avoid reliance upon any particular source of funding, the loss of which could jeopardize the sustainability of programs and services.

Project Inform acknowledges the wide range of opinions regarding appropriate sources of funding for health advocacy organizations. In particular, some question whether it is possible for agencies like Project Inform, which work on disease-specific efforts, to receive donations from corporations that benefit from the identification, treatment, or prevention of diseases without compromising positions on critical issues. Additionally, some question whether even the appearance of corporate influence is problematic.

Project Inform believes that corporations in the health space, including pharmaceutical corporations, are among the essential partners to engage. We are grateful that pharmaceutical corporations produce highly effective medications to treat and prevent HIV and cure hepatitis C, and we cannot end either epidemic without the involvement of such organizations. The role of lifesaving drugs as a critical component of health care means that Project Inform must encourage and support their use. We must also address barriers to treatment that too many people living with and at risk for HIV and hepatitis C experience, including high drug prices, lack of and limited health care coverage, consumer cost-sharing burdens, and limits on access to patient assistance programs.

As a founder of the Fair Pricing Coalition, and through many other forms of health care advocacy, Project Inform continues to be very outspoken about these barriers, both publicly and in direct conversations with pharmaceutical corporations and governmental agencies. It is central to Project Inform’s ability to accomplish our mission, and borne out by our history, that the agency is an independent, impassioned, and reliable source of HIV and hepatitis C health care, prevention, and treatment information, and an effective and respected advocate for research, health care, and treatment access, while receiving corporate and government funding for this work. Because Project Inform’s work is driven by our mission, and not by our funders, the organization has, on occasion, lost corporate support due to positions on critical issues.

Project Inform believes it is ethical to encourage corporations (including those profiting directly from their work in HIV and hepatitis C) to devote some of their profits and charitable contributions to support activities that benefit people at risk for and living with HIV and hepatitis C. Indeed, we believe they have a responsibility to give back in this way, particularly in areas such as hepatitis C where little or no other funding opportunities currently exist (e.g., disease-specific research and policy advocacy).
Others question whether funding from government entities can unduly influence advocacy efforts with government agencies. Project Inform believes that, like corporations in the pharmaceutical industry, the government is also an important and appropriate partner to engage. We conduct objective and strategic policy and budget funding advocacy with our government partners, despite receiving funding for specific program initiatives.

To prevent real or perceived influence by any donors, Project Inform follows a policy of disclosure and transparency regarding its financial information, donors, programs, and policy and advocacy positions. Project Inform also has written policies, authorized by its Board of Directors, to govern its acceptance of donations from all donors, including corporate, foundation, government, and private donors. These policies include:

1. Donations to Project Inform are only used in the fight against HIV and hepatitis C. Project Inform works to ensure that any donation will result in the maximum possible benefit to its constituents and the community, with the minimum possible administrative costs.

2. Project Inform solicits and accepts support only for projects and activities that are consistent with its Mission and Ends Statements, which have been previously reviewed and approved by the Board of Directors.

3. Project Inform maintains, at all times, an independent position on issues affecting the welfare of people at risk for and living with HIV and hepatitis C. The interests of a donor or prospective donor are not a factor in Project Inform’s decision-making process. The threatened or actual loss of funding will not dissuade us from taking public positions informed by our organization’s values, mission, and ends.

4. Project Inform does receive restricted donations from corporations, non-profits, foundations, and government entities. When it does so:

   - Project Inform retains control over all aspects of the project;
   - Assures that the project meets a special, time-sensitive need of Project Inform or its constituents; and
   - Assures that a written agreement regarding the restrictions is in place. When specified in written agreements, the results of programs or projects funded by grants are reported to the donor.

5. Unless a donor provides consent for an alternative outcome, any restricted donation is used only for its agreed-upon purposes.

6. Project Inform reserves the right to announce publicly all donations from corporate, non-profit, foundation, and government sources, although it respects the rights of individual donors who seek privacy.

7. Project Inform does not allow donors to edit materials produced by the agency, including policy and program positions and press releases prior to their publication, except in the case of
press releases specific to the granting of a donation. In turn, Project Inform may also ask for the opportunity to review drafts of similar materials or promotional pieces produced by donors.

8. To discourage the potential for or appearance of donor influence on programs, policies, or positions of the agency, Project Inform program staff are not involved in soliciting corporate, government, or non-profit foundation donations. Rather, program staff members are instructed to refer all such matters to the Executive Director or development or administrative staff.

9. As a matter of policy, the organization does not disclose its constituent mailing list for external use, nor is the list rented, lent, or shared, except for very limited one-time uses in collaboration with other non-profit organizations to benefit constituents.

10. Project Inform discloses all donations of $100 or more on a yearly basis in the form of an annual report which is mailed or emailed to all donors and is also available on request at the organization’s office. Project Inform also posts its annual tax returns (990s) and audited financial statements on its website, www.projectinform.org.

11. Members of the Project Inform Board of Directors and staff are prevented from direct holdings in or relationships with companies involved in HIV and hepatitis C diagnosis, treatment, or preventative medications, with the exception of owning mutual funds pursuant to retirement accounts.

12. Project Inform does not elect members of the Board of Directors who are employees of pharmaceutical or diagnostics corporations having products targeting HIV or hepatitis C.

**Guidelines for research activities**

In order to provide input and guidance on the design and conduct of basic and clinical research, Project Inform staff may sign non-disclosure agreements with industry and academic researchers and staff. These agreements allow for free discussion between community organizations and industry and academic researchers about the development of new treatment and preventative interventions for HIV and hepatitis C. However, Project Inform reserves the right to make public any of its own concerns or those expressed by fellow advocates to the company or university researchers, without revealing proprietary information or otherwise violating any confidentiality agreements.

**Guidelines for Project Inform-sponsored educational materials, trainings, and meetings**

Project Inform’s educational materials and trainings bring an awareness of HIV and hepatitis C health care, prevention, and treatment options to people at risk for or living with those diseases, as well as their advocates and health care and service providers. Our materials and trainings also provide guidance on actions these stakeholders can take to access health care and treatment options. Occasionally, Project Inform also holds meetings or “think tanks” to answer key questions posed by the HIV or hepatitis C epidemics. Given the important role these materials, trainings, and meetings play in improving access to prevention and treatment options, Project Inform staff and volunteers guarantee that:
1. The content of publications, meetings, and presentations is based on up-to-date, well researched, and scientifically accurate information, presented in a balanced, objective manner, and not modified or influenced by corporate, government, non-profit, or other donors.

2. There is full disclosure of any direct corporate, government, non-profit, or other support for particular publications, trainings, and meetings. In the case of meetings, the disclosure is made in invitations to participants, at the meeting, and in any reports produced regarding the meeting.

3. There is disclosure of any guest presenter’s financial relationship to any company that produces any drugs or therapies discussed at the meeting by the presenter.

4. Project Inform encourages informed decision-making by patients and constituents regarding all aspects of their health and health care. To that end, Project Inform provides information about specific products (including risks and benefits) and vendors available to address HIV and hepatitis C infection. Project Inform does not promote the use of specific products or vendors. In limited cases, as with PrEP (Pre-Exposure Prophylaxis), Project Inform may educate constituents about an evidence-based health care action where there is only a single product or vendor available, but it will not promote the product itself.

**Guidelines for policy and advocacy work**

Project Inform conducts extensive public policy activities, seeking to influence the activities of federal, state, and local governments at administrative, legislative, and budgetary levels. The goal of these activities is to specifically benefit people living with or at risk of HIV and hepatitis C and not to directly benefit any donor to Project Inform.

While Project Inform staff members may discuss public policy issues it addresses and its positions on those issues with donors, donors do not select or control those issues or positions.

Project Inform does not permit donors, legislators, or government agencies to alter its policy positions or activities.

**Guidelines for participation in hearings**

In our role as a health care and treatment advocate, Project Inform staff and volunteers are often called upon to provide testimony at public hearings and in various stakeholder and advisory groups. Project Inform will not receive donations from corporations with a vested interest in the results of a hearing in order to ensure attendance at the hearing by staff or volunteers, or to direct the testimony or input provided by staff or volunteers.

**Guidelines for co-sponsorship of, participation in, or presentation at conferences, meetings, or other educational activities initiated by others**

As HIV/AIDS and hepatitis C treatment and public policy advocates and educators, Project Inform and its staff and volunteers are often asked to co-sponsor, participate in, or present at conferences, meetings, or other educational activities initiated by others. The purpose of
attendance at such a meeting or event is to benefit Project Inform’s constituents in the form of information or advocacy. For these activities:

1. Donors do not control the content of presentations made by Project Inform staff members or volunteers.

2. Project Inform may only accept reimbursement for reasonable travel, lodging, and meal expenses when necessary to support the participation of staff in a meeting that directly furthers our mission.

3. Any honoraria paid to staff members or volunteers for time required to participate in an invited meeting must be paid directly to Project Inform. In very rare instances, government committees or sponsors of events are not able to write checks of honoraria, per diem, etc. to Project Inform and must write a check to an individual. In these instances, the recipient must sign checks over to Project Inform and provide records related to the payment from the payee to Project Inform.

Guidelines for acceptance of gifts to individual staff or volunteers from donors, including meals

With the exception of meals with a $75.00 limit as set forth below, no gifts or entertainment, including cash, may be accepted by Project Inform Board Members, staff, or volunteers from corporate donors.

Project Inform Board Members, staff, and volunteers may have meals paid for by donors in an amount not to exceed $75.00.

These policies were reviewed and approved by the Project Inform Board of Directors on January 17, 2017 in San Francisco, CA.