



October 30, 2024

Dear Members of the 2023-2024 Advisory Committee on University Resources Management (ACURM),

I am writing in response to your recommendations regarding the three requests made in the Sunrise Brown petition titled “Dissociate Now: A Fossil Free Brown.” As you have noted in your advisory report sharing those recommendations, the Committee received the student-led petition in February 2023, and it was reviewed by the Committee over the course of several months in 2024. I received your initial report, dated June 28, 2024, following that review; and then received your updated report, dated September 12, 2024, following my discussion with the Committee on August 22, 2024. As I mentioned when we met to discuss the initial report, several of your recommendations require the involvement of the Faculty Executive Committee and the Division of Research. Having reviewed your updated report, I am sharing my response with you after discussions with those groups. This response, as well as your final September 12 report, will be posted on the ACURM website, and the Brown University community will be informed that these documents are available via Today@Brown.

I want to start by thanking the committee for its thorough and thoughtful work. The terms of several members of ACURM who worked on this report concluded at the end of the last academic year, and I am including those members (those who are still at Brown) on this memo. As a committee of faculty, staff, students and alumni, ACURM and its predecessor committee has long relied on the commitment of its members to support Brown’s shared governance model for examining issues of community concern.

I want to provide context for my response to the Committee’s recommendations by first summarizing ACURM’s responses to the three specific requests made in the Sunrise petition:

Sunrise Request 1, Research: Prohibit fossil fuel companies, their affiliated foundations, and industry groups from funding research and donating to the university.

ACURM considered this matter and did not recommend in favor of this request. However, it offered three alternative recommendations related to research supported by the fossil fuel industry that address issues raised in the Sunrise Brown petition. Below, I provide my responses to ACURM’s alternative recommendations.

Sunrise Request 2, Recruitment: Adopt a fossil fuel-free careers policy that bans fossil fuel companies from hosting recruiting events and attending career fairs, posting job vacancies, sponsoring events, and otherwise advertising to students through Brown.

ACURM declined to take up this matter, indicating that it is the responsibility of the Center for Career Exploration to ensure that its recruitment practices are aligned with existing University policies. The report specifically notes the University’s business ethics policy as well as an existing faculty rule that states that “Brown students have the freedom both to consult with recruiting organizations to seek employment interviews and also to express their views (about) those organizations, providing they do so

in legal ways that do not infringe upon the rights of others.”

Sunrise Request 3, Retirement: Require all retirement plan vendors to offer fossil-free retirement plan options.

ACURM declined to take up this matter, given a fossil-fuel free option was added to Brown’s retirement plan options — specifically to Fidelity’s 403(b) plan — after Sunrise submitted its petition.

The rest of this letter is concerned with ACURM’s recommendations concerning Request 1, research supported by the fossil fuel industry. In what follows, I review Brown policies that are relevant to this request and share my responses to ACURM’s recommendations on this matter.

Relevant Policies and Processes

Several University policies and processes are relevant to the issue of when, if ever, Brown researchers should be restricted in applying for and barred from receiving research grants from specific sources.

The most important is the University’s **Statement on Academic Freedom**, which can be found in Brown’s [Faculty Rules and Regulations \(Part 5, Sec.12.I.C\)](#). The statement reads, in part: “Brown University, mindful of its historic commitment to scholarship and to the free exchange of ideas, affirms that faculty members and students alike shall enjoy full freedom in their teaching, learning, and research.” This policy statement signals that restrictions on research funding should be imposed carefully and rarely, since barring research funding from specific types of sources would restrict the ability of faculty to enjoy full freedom in their research.

There are, however, two situations in which Brown may restrict research grants. First, the terms of research grants must be compliant with Brown’s [Openness in Research Policy](#), which stipulates (among other things) that grant-making organizations cannot infringe on the academic freedom of researchers by, for example, blocking the publication of results or exerting influence on research findings. Second, [Brown’s Gift Acceptance Policy](#) (which applies to research grants from foundations) states that gifts may not be accepted if doing so “could inflict damage on the University’s reputation, standing or integrity or be contrary to University values.” On this basis, it already is the case that grants from organizations that disseminate scientific disinformation, defined as knowingly spreading false information, cannot be accepted.

Due diligence for gifts and grants to ensure compliance with University policy is the responsibility of the Advancement Division (for gifts) and the Research Division (for grants). Due diligence is conducted on (1) all gifts of over \$1 million from Brown alumni; (2) gifts of any size from people unconnected with Brown; and (3) grants from corporations and foundations that have not made a grant to the University in the past five years. After due diligence is complete, the **Gifts and Grants Review Committee (GGRC)**, described in Brown’s [Faculty Rules and Regulations \(Part 1, Sec.2.III.K\)](#), reviews gifts and grants that, through the relevant due diligence processes, are determined to be at risk of not being aligned with University policy. In addition, it reviews a random sampling of gifts and grants that went through the due diligence process and were determined by Advancement or the Research Division to not to be at risk of falling afoul of University policy.

Responses to ACURM’s Recommendations

ACURM made three specific recommendations related to research sponsored by the fossil fuel industry. The report notes that “these recommendations can be taken holistically, but also separately.” These recommendations, and my responses, are below.

ACURM Recommendation 1: Bring a faculty vote on the question of a University-wide policy restricting research funding derived from the fossil fuel industry and, if approved, establish a faculty committee to develop principles, metrics, decision criteria, and standards for instituting the new policy.

The ACURM reports states that the committee “cannot recommend that the Corporation and thus the Administration implement a dissociation from fossil fuel industry sponsored research without a vote of the Brown faculty.” This recommendation is motivated by ACURM’s view that faculty are the most important stakeholders in matters concerned with academic freedom. Specifically, ACURM’s report cites the AAUP 1994 Statement on the Relationship of Faculty Governance to Academic Freedom, which highlights the important role that faculty play in protecting academic freedom, and concludes from this that “any decision that may result in restrictions on academic freedom of individual faculty must derive from the faculty, not from Brown University administration or the Corporation.”

I believe that ACURM’s recommendation reflects a lack of appreciation of the vitally important role that Brown faculty already play in protecting academic freedom under our community’s processes of shared governance. The faculty’s role is codified in a number of faculty-approved policies that are implemented by committees established by the faculty, including ACURM and the GGRC. By establishing these committees, the faculty delegated the responsibility to thoroughly investigate issues and make recommendations on matters that fall under their charges. It is unclear why, in this case, the full faculty should vote on a matter that is already under the purview of existing faculty committees. This raises questions about creating a precedent for subverting established governance via ACURM.

Given that this recommendation is concerned with a matter of faculty governance, the Faculty Executive Committee (FEC) officers have expressed willingness to meet with ACURM members to discuss the intent and content of this recommendation. I look forward to learning whether and how the FEC would like to address this recommendation from ACURM.

Related to this recommendation, I would like to provide a clarification on a potential Brown precedent, cited in the ACURM report, that appears to support the view that the faculty as a whole should consider actions to restrict the research funding opportunities of their colleagues. The precedent stated in the report is that, in 2011 the faculty of the Division of Biology and Medicine’s Department of Public Health (now the School of Public Health) voted to not accept research grants from tobacco companies. Although it appears to continue to be the norm in the School of Public Health to eschew funding from tobacco companies, this vote was never codified into University policy. I was not able to determine why the matter was never formally resolved at the time, as this predates current university leadership, but there is no documented precedent of a faculty vote establishing policy to restrict research funding.

I also want to note that, in recent months, there have been new developments in both of the precedents from other institutions cited in the ACURM report as examples of universities that have disassociated, or might disassociate, from fossil fuel companies for the purpose of research funding. In June 2024, Stanford University issued a [report](#) that did *not* recommend placing restrictions on research grants from fossil fuel companies. In October 2024, Princeton University [announced](#) that it would resume accepting research funding from the fossil fuel industry, although with the provision that research supported by the fossil fuel industry must be “aimed toward the amelioration of the environmental harms of carbon emissions.”

ACURM Recommendation 2: Establish a faculty mentoring committee convened by the Office of the Vice President for Research (“OVPR”) that provides educational programming and mentoring to new and current faculty, graduate students, and post-doctoral fellows, and pre-award staff regarding fossil fuel research funding at Brown.

When I met with the committee in August, ACURM members expressed the concern that researchers contemplating applying for funds from fossil fuel companies may not fully understand the risks of having corporate sponsors that may try, subtly or not-so-subtly, to influence research programs, and researchers may not know how to respond if this occurs. This concern is certainly valid for research funded by the fossil fuel industry, and also for research of any type that is sponsored by corporations that may have a financial interest in the results of research, for example, companies in the pharmaceutical or biomedical device industries.

I agree with ACURM that it is important for Brown researchers, including faculty, postdoctoral fellows and graduate students, to have opportunities to be educated about these issues. The leadership in the Division of Research (formerly OVPR) also agrees, and will sponsor discussions on this topic that will be facilitated in partnership with current faculty members from a range of fields, including environmental research, who have grappled with the issues. Through these workshops, faculty will be connected to colleagues who can offer mentorship and advice when issues and concerns arise. The Vice President of Research can, with input from Brown's Research Advisory Board and other faculty, determine whether a faculty working group or committee is needed to plan and implement this work.

ACURM Recommendation 3: Institute a new charge to the Gifts and Grants Review Committee ("GGRC") requiring the GGRC to identify and review all research grants and gifts for research sponsored by organizations representing the fossil fuel industry.

The primary rationale for this recommendation is to increase transparency and increase confidence in how Brown considers research grants. In reviewing this recommendation and discussing it with ACURM and the FEC leadership, I believe that two improvements — one to policy, and another to process — will achieve these objectives.

The first is to amend the charge of the Gifts and Grants Review Committee to make it explicit that the policy covers grants from corporations as well as foundations, which is currently not the case. I have discussed this with the FEC officers, who are prepared to discuss this matter with the Faculty Executive Committee and, if there is agreement, bring this change in the committee's charge to the faculty for a vote this fall.

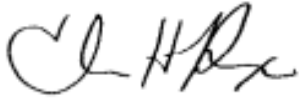
The second is to be as transparent as possible about the organizations — government agencies, foundations and corporations — that make research grants to Brown. Starting in November 2025, the University will include in its Annual Financial Report a full list of organizations (although not the identities of funded researchers or amounts of awards) that have supported Brown research in the previous academic year. The financial report appears on the Brown's Finances page of the University's website and currently includes a sampling of high-impact awards. Making the full list public should allay concerns that Brown is accepting research grants from organizations that are not aligned with University policy. Furthermore, the range and quality of organizations that support Brown research should be a point of pride.

Note that, although it is too late to include this information in the Fiscal Year 2024 Annual Financial Report coming out in late November, the GGRC will be given the list later this semester. Some research contracts stipulate the University cannot publish the name of the research sponsor without prior written consent, or can do so only for reporting related to federal compliance. Brown will request written consent when needed. In addition, the identity of the remaining research sponsors whose names cannot be listed publicly because of contractual restrictions or lack of consent will be shared with GGRC on a confidential basis.

Conclusion

I want to thank ACURM for grappling with this important set of issues. I hope that my response to the committee's report helps to strengthen approaches that contribute to educating Brown researchers about complex ethical issues in research and build confidence in the University's robust policies and processes.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. H. Paxson', written in a cursive style.

Christina H. Paxson

President

CC: Members of the 2024-2025 Advisory Committee on University Resources Management (ACURM)