
THE GEORGE WASHINGTON UNIVERSITY

WASHINGTON, DC

Transparency in Funding Task Force Report March 10, 2025

Purpose

The Task Force was charged by the Provost to make a recommendation as to whether the university should adopt a policy of full disclosure on where research and gift dollars originate, and if so, to determine if monetary thresholds and/or exceptions should be instituted.

Task Force Members

Task Force members were chosen by the Provost for their roles in the university - representing key constituents with responsibilities to legally, ethically, and successfully carry out the objectives of externally funded projects. Members include:

- Gina Lohr, Senior Associate Vice Provost for Research (Office of the Vice Provost for Research)
- J. Zoë Beckerman, Teaching Professor and Vice Chair for Academics, Department of Health Policy and Management (Faculty)
- Susan Boerstling, Assistant Vice President, Corporate and Foundation Relations (Development and Alumni Relations)
- Claire Stamm, Assistant Director, Contracts and Award Acceptance, Office of Sponsored Projects (Office of the Vice Provost for Research)
- Andrea Trisciuzzi, Associate Vice President, Principal and Legacy Gifts (Development and Alumni Relations)
- Rebekah Tromble, Associate Professor of Media and Public Affairs; Director of the Institute for Data, Democracy and Politics (Faculty/Investigators)

Executive Summary

The Task Force reviewed GW's policies and procedures that relate to acceptance, negotiation and disclosure of research and gift funding and determined that GW employs appropriate measures to assess incoming funding and associated restrictions; however, the Task Force recommends a series of actions to further clarify GW's processes for various stakeholders.

As background, GW has robust and long-standing policies, procedures, and protocols govern the acceptance of external funding that align with the university's mission and the principles of the university charter.

Importantly, GW's funding negotiation, acceptance and disclosure practices align with many of our peer institutions. For example, some peer institutions allow anonymous gifts at the request of the donor, but the donor is not anonymous to university leadership. It is also standard practice among our Association of American University peers to have robust financial conflict of interest disclosure policies which mitigate the risk of hidden personal agendas or actions that may jeopardize the university's reputation.

The Task Force found that for GW's diverse funding portfolio of donations (i.e., gifts) and sponsored projects (i.e., grants and contracts), the university makes concerted efforts to balance confidentiality with disclosure, so as not to stifle individual or collective scholarly pursuits and to maximize funding opportunities. In direct support of GW's mission, the Task Force believes that it is in the best interest of the entire GW community that innovation, scholarly work and research being undertaken by faculty, staff, post-doctoral appointees, and students is not hindered. Ensuring a careful balance between confidentiality and disclosure requires certain privacy protections for donors/funders (if they request it) as well as those performing the actual funded work. This is important for the protection of researchers and donors in potentially controversial research areas. The Task Force is aware of public disclosure having resulted in negative health and safety risks for researchers. Therefore, the Task Force aims to ensure that protections exist for researchers, and the Task Force thinks such protections will foster and support academic freedom.

The Task Force recommends the following ways to strengthen the balance between maintaining appropriate confidentiality of donors and researchers with public disclosure. Additional details can be found in the Recommendations section.

- Build a GW webpage or website to highlight the university's guiding principles for the acceptance of external funds, i.e., philanthropic and research funding.
- Regularly review and update all policies relevant to the negotiation and acceptance of external funds.
- Consider updating GW's Gift Acceptance Policy and procedures to refine and clarify the guiding principles underpinning the acceptance of philanthropic funding.
- Assess who is requesting data about external fundings to streamline and standardize the requests.
- Provide opportunities for discussion around the increase in hostility towards scholars as well as create GW-specific trainings and a toolkit for our community.

Background and Methodology

Provost Bracey convened the Task Force in June 2024 and charged it with investigating practices, policies, procedures, and the culture of transparency in funding, in order to make recommendations for a scholarly environment where diverse views can be explored and debated without compromising individuals' safety or the university's mission.

The Task Force started the process by reviewing GW's commitment to free expression as reflected in the university's [Faculty Code](#) regarding Academic Freedom:

Subject only to legal restrictions and such guidelines as shall be recommended by the Faculty Senate and adopted by the university:

- A. A faculty member shall enjoy freedom of expression. In the classroom (physical, virtual, and wherever located), a faculty member's exposition shall be guided by the requirements of effective teaching, adherence to scholarly standards, and encouragement of freedom of inquiry among students. In speaking and writing outside the University, a faculty member shall not attribute his or her personal views to the University.
- B. A faculty member shall enjoy freedom of investigation.

- C. Consistent with academic freedom, faculty members should show respect for the opinions of others and foster and defend intellectual honesty, freedom of inquiry and instruction, and the free expression of ideas¹;

and the [Code of Student Conduct](#), as stated in the Statement on Student Rights & Responsibilities:

“Academic institutions exist for the transmission of knowledge, the pursuit of truth, the development of students, and the general well-being of society. Free inquiry and free expression are indispensable to the attainment of these goals².”

In response to the Provost’s charge, the Task Force viewed issues of transparency, disclosure, and associated consequences through various macro and micro perspectives including those of:

- GW as a whole
- Schools within GW
- Departments and units
- Individual faculty members or investigators
- Students (as recipients of gift or grant funds)
- Donors, sponsors and funders, and
- Peer institutions.

Task Force members brought their knowledge, expertise, and GW experiences to the review and assessment of current practices for accepting external funding. Additionally, the Task Force reviewed instances in which faculty members have been publicly harassed or threatened, research was performed on polarizing topics, and projects had anonymous funders. Some faculty members also confidentially shared their experiences directly with Task Force members.

The Task Force reviewed the university’s existing policies, procedures, protocols and guidance in relation to accepting external funding, whether in the form of gifts or sponsored projects including:

- GW’s policy on the [Categorization of External Funding](#);
- GW’ policy on [Gift Acceptance](#);
- GW’s [Naming Policy](#);
- Development and Alumni Relations’ business processes and procedures for reviewing requested terms associated with a gift; and
- The Office of Sponsored Projects business protocols for accepting and negotiating non-standard terms and conditions in grants and contracts.

The Task Force sought examples from peer market-basket institutions including Boston University, Carnegie Mellon University, Georgetown University, New York University, Rochester Institute of Technology, Tufts University, Tulane University and the University of Pittsburgh.

Findings

Upon collecting and analyzing the data and information provided above, the Task Force found:

- More than 80% of GW’s sponsored projects are from sponsors who publicly display their awards and encourage publication of results (e.g., the federal government,);

¹ Faculty Code. (2019, May). *Section II. ACADEMIC FREEDOM*.

<https://provost.gwu.edu/sites/g/files/zaxdzs5926/files/2023-05/faculty-code.pdf>.

² Code of Student Conduct. (2023, August). *Statement of Student Rights & Responsibilities*.

<https://students.gwu.edu/code-student-conduct>.

- Individual funders sponsor a very small percentage of GW’s funding, compared to GW’s overall portfolio (e.g., sponsored projects expenditures from industry or corporate sponsors are less than 2% of GW’s total);
- The majority of individual gifts are \$999 or less. This size gift accounts for more than 90% all gifts donated; and
- Fewer than 0.1% of gifts received at GW have a request for donor anonymity.

The Task Force determined that based on this data, the risk by any one outside donor or funder of exertion of influence over GW’s mission is significantly low.

Importantly, upon reviewing the GW policies and procedures listed above, the Task Force determined that GW routinely employs appropriate measures to assess incoming funding and any associated restrictions. Specifically, the Task Force found that both the gift and sponsored projects pathways have standard terms and conditions that allow for maximum academic freedom. This means that the standard terms and conditions used for receiving funds allow GW’s researchers to pursue research and scholarly activities in an independent and ethical manner, publish and/or promote findings without prior approval by funders, and administer gift funds in ways that align with GW’s values and core commitments. At the core of all GW’s protocols, policies and processes that the Task Force reviewed is the principle of upholding the integrity of individual researchers and GW as a whole.

Furthermore, when a funder or donor requests language that deviates from or is more restrictive than GW’s standard terms and conditions, the few GW representatives who are authorized to negotiate terms and conditions do so in a manner that minimizes restrictions or deviations from university policies and ensures the terms and conditions align with the university’s mission. GW also has escalation procedures in place to ensure that division and university leadership are aware of and/or make the final decisions on any non-standard terms and conditions.

In the rare case that funders request anonymity, it is important to note that even if a sponsor or donor appears anonymous to the public, they are not anonymous to GW leadership. Therefore, GW is not blindly accepting funds without doing careful due diligence. Additionally, the Task Force acknowledges that certain topics are more politically divisive than others. Academic freedom allows for and embraces researchers pursuing such topics. Researchers that do so at GW should not have to fear for their safety or their livelihoods.

While reviewing GW’s protocols and publicly available policies of peer institutions, the Task Force found that GW’s gift policy generally aligns with our peers but is briefer and more succinct compared to others. A few peer institutions’ policies that the Task Force reviewed stated they do not “generally” accept anonymous gifts. However, those were guiding principles which allowed for exceptions – much like GW’s policies. Similarly, GW’s processes and policies regarding sponsored projects align with our peers in terms of safeguarding scholars’ academic freedom.

For the small percentage of gifts and sponsored projects that are accepted with restrictions and/or deviations, including for example funder anonymity or limiting publicity, the Task Force identified several valid reasons for the exceptions including:

- The academic freedom of GW faculty as a whole should not be put in jeopardy or compromised by the work or subject matter of one researcher, funder, gift or grant. GW is the sum of its parts and is not defined by any one scholarly pursuit. This means on occasion a term or condition may be accepted to protect GW’s institutional reputation from being maligned or misrepresented.
- The academic freedom of an individual faculty member to pursue new and sometimes controversial scholarship should not be stifled by others with differing views, or by concerns for their personal safety due to harassment, intimidation, doxing, or other threats. Researcher anonymity could be warranted

in such cases. The Task Force heard examples of this type of concerning behavior targeted at individual GW faculty members. Such examples included doxing, threats, and intimidation and harassment including receiving personally-targeted mail from a special interest group.

- Private donors may want to discourage being inundated with fundraising requests from others seeking funding. GW seeks to avoid discouraging funding by appearing to disregard a donor's or sponsor's concerns. Funders may fear a risk to their reputation and/or personal safety if their contribution to the university is disclosed. Or a funder's culture, country, or industry may frown upon disclosure of support (i.e., they are more conservative or private about the discussion of money and philanthropy than some of GW's other stakeholders).

Recommendations

The Task Force recommends that in addition to continuing to follow its current policies, procedures, and practices for receipt of funding, GW should:

- Create a web presence as a stand-alone website or as a webpage under an existing GW site to highlight GW's guiding principles for the acceptance of philanthropic and research funding. It should include a statement about the comprehensive internal processes and protocols already in place that guard against potential harm to individual's or the university's reputation, scholarly pursuits, or personal safety. Relevant policies and many of these practices already exist on GW's website but are scattered across different locations and stakeholders may not know where to find them all. Creating a centralized access point would improve accessibility for all interested parties.
- GW should regularly review and update policies relevant to the negotiation and acceptance of external funds to reflect its mission and the guiding principles employed in the everyday activities of a thriving university. This encompasses those governing the operational and administrative work of doing the university's business, as well as the long-standing ethical principles governing scholarly research.
- GW's Gift Acceptance Policy and procedures should be reviewed to consider adding language to refine and clarify the guiding principles. Suggestions include:
 - A gift will not be accepted if it does not align with GW's mission, values, or core principles;
 - Accepting a gift does not imply that the university endorses or supports the donor's beliefs, opinions, businesses activities or affiliations;
 - In some circumstances GW may honor a donor's request for anonymity; however, while their identity may not be publicly disclosed, university leadership is fully aware of and has thoroughly vetted the donor.
- Review who is requesting data about external funding and by what method each request is made. GW could then use the gathered information to create a simple, streamlined process for individuals to request data about funding, along with accompanying guidelines and parameters for what data can be shared, with whom, and for what purposes.
- Develop GW-specific trainings, a toolkit, and opportunities for discussion around the increase in hostility towards scholars and their findings.
 - Create and offer training for researchers who have experienced an attack, intimidation, or harassment due to their scholarly pursuits.
 - Host researcher-led discussion groups, particularly for those whose research is on polarizing topics.
 - Create and offer preparedness training for administrators and mentors.
 - Build a toolkit that discusses how to determine threats to researchers, how to respond, GW-specific protocols and guidance and resources to help with an individual's personal and professional life (including mental health and addressing safety concerns). Examples of such a toolkit and other resources are already publicly available. For example, the [Researcher Support Consortium](#) provides a wealth of information and free, downloadable materials.

Conclusion

Over its 200-year existence, GW has grown and evolved into a highly regarded, comprehensive, research-intensive institution that does not shy away from tough topics – even when those topics can be polarizing. The university reached these heights in part due to the long history of encouraging free expression and protecting academic freedom. The recently-launched [Free Expression](#) website drives home many of the points the Task Force has determined are salient to this report. We are confident that GW has, and is using, the right tools to continue its legacy of diversity of ideas while simultaneously protecting individual scholars and the university's integrity. The Task Force also believes that the suggestions it makes within this report will help to ensure that various stakeholder groups more fully understand how GW makes donor and research funding decisions, and that GW, its researchers, and their research will continue to thrive.