

## **UCSF Industry Documents Library**

### *Collection Development Policy*

#### **Introduction**

The purpose of the UCSF Industry Documents Library Collection Development Policy is to 1) outline the scope of collecting activities of the UCSF Industry Documents Library and 2) provide detailed criteria for collecting decisions.

#### *Industry Documents Library Mission Statement:*

The mission of the UCSF Industry Documents Library is to identify, collect, curate, preserve, and make freely accessible internal documents created by industries and their partners which have an impact on public health, for the benefit and use of researchers, clinicians, educators, students, policymakers, media, and the general public at UCSF and internationally.

#### **Research Community**

The [UCSF Industry Documents Library](#) (IDL) is an online portal to aid investigation about corporate practices within and across industries which have an impact on public health. IDL currently brings together materials created by the tobacco, drug, chemical, food, and fossil fuel industries and by individuals and organizations working with industries. These collections are an important resource for researchers, lawyers, journalists, advocates and the general public as they document industry strategies and tactics around scientific research, marketing campaigns, regulatory strategies, and public health policy formulation.

The Industry Documents Library is freely available to all and can be accessed at any time on the web at <https://www.industrydocuments.ucsf.edu>.

## **Collecting Scope**

The UCSF Industry Documents Library collects documents produced by industries and their partners which illustrate efforts to influence policies and regulations meant to protect public health.

IDL's primary emphasis has focused on the tobacco industry, with expansion into other industries, including drug, chemical, food, and fossil fuel industries. Additional industries may be added pending availability of relevant document sets, funding opportunities, and relevance to UCSF research priorities involving public health and public health policy.

IDL concentrates its efforts and resources on collecting digital copies of primary source documents in diverse formats, including correspondence, memos, internal reports, meeting minutes, charts, pamphlets, advertisements, depositions, trial transcripts, photographs, illustrations, social media posts, webpages, and research data. IDL does not generally collect journal articles, publications, newspapers, or other secondary sources readily available elsewhere.

The primary responsibility of the Industry Documents Library is to serve the research needs of individuals interested in public health.

## **Current Collections**

The Industry Documents Library includes documents in five major collections:

- The Truth Tobacco Industry Documents (TTID): over 15 million documents
- Drug Industry Documents Archive (DIDA): over 9,000 documents
- Chemical Industry Documents Archive (CIDA): over 9,500 documents
- Food Industry Documents Archive (FIDA): over 133,000 documents
- Fossil Fuel Industry Documents Archive (FoFIDA): over 1,100 documents

**The Truth Tobacco Industry Documents Library** (formerly known as the Legacy Tobacco Documents Library) was created in 2002 by the [UCSF Library](#) in cooperation with the UCSF [Center for Tobacco Control Research and Education](#). The archive was built to house and provide permanent access to tobacco industry internal corporate documents produced during litigation between U.S.

states and the seven major tobacco industry organizations and other sources. These internal documents give a view into the workings of one of the largest and most influential industries in the United States.

**The Drug Industry Documents Archive** was created by the UCSF Library in collaboration with faculty members C. Seth Landefeld, MD and Michael Steinman, MD. Originally established to house documents from an off-label marketing lawsuit against Parke-Davis (*United States of America ex rel. David Franklin vs. Parke-Davis*), the archive has grown to include documents from additional sources illustrating how the pharmaceutical industry, academic journals and institutions, continuing medical education organizations and regulatory/funding agencies operate in ways that influence public health.

#### *Opioid Industry Documents*

In 2019 IDL began collecting opioid industry documents publicly disclosed in litigation and other sources, and is continuing to add these document sets to the Drug Industry Documents Archive. As of November 2020 the opioid industry documents collection includes 3,300 documents.

**The Chemical Industry Documents Archive** was created by the UCSF Library in collaboration with the UCSF [Program on Reproductive Health and the Environment \(PRHE\)](#). It contains significant collections documenting internal practices of companies and regulatory agencies which impact the public's exposure to toxic chemicals.

**The Food Industry Documents Archive** launched in November 2018 as a collaboration between the UCSF Library and the [Philip R. Lee Institute for Health Policy Studies](#), with an initial focus on the sugar industry. The scope of this collection is expected to expand into other areas of food industry science and policy.

**The Fossil Fuel Industry Documents Archive** was established in June 2019 with a foundational collection of documents provided by the [Climate Investigations Center](#), which include internal memos, reports, correspondence and scientific studies from major fossil fuel corporations and related organizations which detail the industry's research and reaction to anthropogenic climate change beginning in the 1950s to the present.

## **Collection Sources**

Industry documents collections are obtained through:

- Litigation: IDL collects industry documents produced during legal discovery and as evidence submitted during trial. We both solicit and receive these publicly disclosed documents via court order (as in the *US v. Philip Morris* racketeering case), attorneys (plaintiff's attorneys, class action lawyers, state attorneys general), expert witnesses, and PACER (Public Access to Court Electronic Records) downloads.
- Existing archives: IDL also enters into partnership with libraries and archives to digitize selected in-scope collections from their holdings, including company records and professional papers of academics or individuals that consulted with or received funding from industry.
- Records requests: Freedom of Information Act (FOIA) and state public records requests.
- Research files: collected or donated by academics, authors, investigative journalists, and others.
- Websites and social media accounts of companies, front groups, trade associations and other organizations.

## **Collection Development for Web Archives**

In addition to digitized and digital documents, the Industry Documents Library also collects and curates websites and webpages which are relevant to IDL's mission and to the industries documented in the collections. The [UCSF Industry Documents Library Web Archive](#) includes information from webpages, websites, and social media platforms.

IDL selectively collects and maintains web archives which complement the document collections as outlined below:

- Websites and webpages published by major companies in each industry (ex: [www.philipmorrisusa.com](http://www.philipmorrisusa.com)) or major sponsors/lobbyists

- Websites and webpages identified as relevant to specific research projects, such as e-cigarette marketing
- Websites and webpages related to a relevant and time-based event, such as industry-related ballot campaigns, regulation, or public policy measures. Currently the geographic scope of campaign-related web archives is limited to California.

### **Budget**

The Industry Documents Library does not purchase any documents or document sets. IDL funds are primarily obtained through grants, and are spent on digitization, indexing, and document storage costs to enable access to the collections.

### **Intellectual Freedom and Censorship**

The mission of the UCSF Industry Documents Library is to identify, collect, curate, preserve, and make freely accessible internal documents created by industries and their partners which have an impact on public health, for the benefit and use of researchers, clinicians, educators, students, policymakers, media, and the general public at UCSF and internationally. The IDL is wholly committed to the principles of universal access to information and intellectual freedom, and makes its collections freely available to all so that researchers can exercise their judgement and expertise in interpreting the documents in the broader context of available information and scientific inquiry. The presence of any particular document does not imply IDL or UCSF's endorsement or judgement of its content.

### **Collecting Priorities for 2021-2022**

1. Truth Tobacco Industry Documents

- Continue collecting and processing tobacco industry documents made public by the industry under the requirements of *United States v. Philip Morris* and the Racketeer Influenced Corrupt Organizations (RICO) Act
  - Pursue collections to support UCSF research relating to flavored tobacco products and e-cigarettes
2. Drug Industry Documents Archive
- Further develop opioid industry documents collections
  - Explore opportunities to secure additional collections and funding
3. Chemical Industry Documents Archive
- Obtain additional collections and funding to support research needs of the UCSF Program on Reproductive Health and the Environment (PRHE) and other community stakeholders
4. Food Industry Documents Archive
- Obtain additional collections and funding to support research needs of the UCSF Institute for Health Policy Studies (IHPS) and other community stakeholders
5. Other Collections
- Determine research need and collecting scope for additional industries

### **Document Contributions**

The IDL partners with libraries, archives, organizations, researchers, journalists, attorneys, and others to share and make publicly available digital copies of documents illustrating industry practices which impact public health.

Document contributions accepted are subject to the policies of the Regents of the University of California, with the understanding that the university is a custodian of the documents upon receipt and

reserves the right to determine retention, location, cataloging, digitization and other considerations relating to use or disposition.

Those providing physical or digital documents to the Industry Documents Library agree to grant the IDL and its users full permission to digitize, download, enhance, describe, excerpt, re-use, and publish online all contributed documents and their contents. The IDL credits the contributing individual or organization in all document description, as appropriate.

The IDL welcomes inquiries regarding contribution of documents via the IDL website:

<https://www.industrydocumentslibrary.ucsf.edu/about/donate/>.

## **Collection Evaluation Methods**

### ***Collecting Criteria***

- Relevance: topical or evidential relevance to public health research and publications.
- Research (aka informational) value: documents which contain information about important people, companies, trade associations, products and issues.
- Evidential value: documents that by their very existence provide insight about the corporation or organization that created them.
- Uniqueness: whether these documents exist elsewhere, particularly online.
- Value: long-term value to public health research and public health policy.
- Scope: usefulness across industries and across disciplines.
- Timeliness: the issue represented is under public discussion, or ripe for discussion.
- Legal risk: copyright, privacy and confidentiality, litigation status.
- Cost: of processing compared with research value.

A detailed IDL Appraisal Checklist is available at the end of this document.

## **Collaboration with Other Repositories**

The Industry Documents Library partners with other libraries and archives to digitize and provide access to collections for the benefit of all users. Collections are obtained from other repositories with their full knowledge and permission, and are appropriately credited on each collection page.

## **Deaccessioning and Disposition Policy**

The Industry Documents Library may remove and deaccession documents or collections determined to be out of the scope of our collecting policy.

If deaccessioning of documents or collections is necessary, the Industry Documents Library is guided in this process by archival best practices, including the Society of American Archivists' (SAA) *Guidelines for Reappraisal and Deaccessioning*<sup>i</sup>; SAA's *Core Values Statement and Code of Ethics*<sup>ii</sup>; and the *ACRL Code of Ethics for Special Collections Librarians*, established by the Rare Books and Manuscripts Section (RBMS) of the Association of College and Research Libraries (ACRL)<sup>iii</sup>. IDL will do its best to adhere to any donor specifications or wishes provided at the time of accession when considering the disposition of any documents from the collection.

## **Take-Down Policy**

### *Copyright and Intellectual Property*

The Industry Documents Library makes every effort to ensure that it has appropriate rights to ingest and provide access to documents and collections. Please contact IDL staff with any questions or concerns regarding the copyright of specific documents, or to make a take-down request. Take-down requests will be acknowledged within ten business days and reviewed for further action. The Library may work with UCSF's Office of Legal Affairs to make determinations about copyright and appropriate use.

### *Protection of Personal Information*



Archival records frequently contain personal information about individuals who may or may not have been involved in the activities which led to record creation. Business correspondence may include home addresses, phone numbers, or email addresses; financial records may contain personal account names or numbers; depositions may contain education and employment history. If this information can be used on its own or combined with other available information to uniquely identify an individual it represents a potential breach of privacy. The Industry Documents Library takes the protection of privacy very seriously and redacts certain personally identifiable information found in the documents. Information which legally must be protected is listed in [California State Bill 1386, Personal information: privacy](#) and includes the following:

- Social Security number
- Driver's license number or California identification card number
- Financial account number, credit or debit card number, in combination with any required security code, access code, or password that would permit access to an individual's financial account
- Medical information
- Health insurance information

S.B. 1386 notes that “‘personal information’ does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.”

If collections include medical records, the Industry Documents Library will review the content and determine if the records are affected by the U.S. Health Insurance Portability and Accountability Act (HIPAA) Standards for Privacy of Individually Identifiable Health Information.

Please contact the Industry Documents Library Archivist with any concerns regarding personal information in the collections. Current contact information can be found at <https://www.industrydocumentslibrary.ucsf.edu/help/ask-us/>.

## **Industry Documents Library Collection Appraisal Checklist**

1. What is the provenance of the records? Are the materials from an archival collection, litigation, FOIA request, or something else?
2. Is original order maintained? If archival materials, is original folder order retained? If litigation materials, are Bates numbers present?
3. What is the date range and extent of the collection?
4. What do the records document? What issues, people, companies, or trade associations are most obviously represented?
5. What is the relationship of the records to the current collection?
6. How do the records fit the goals of the Library and UCSF's mission?
7. How do the records fit the goals of the IDL collection policy?
8. Is the information or record duplicated elsewhere in the collection?
9. What is the storage medium? Is the information documented elsewhere in an easier-to-use format?
10. What are the costs of acquiring and preserving the records?
  - a. Identify any salient technical issues, such as poor OCR, need for extensive redaction, etc.
  - b. Identify document boundary definition needs: do the files need to be separated or combined into discrete documents?
  - c. Determine level of indexing: document-level or page-level? In-house or at vendor? Estimate cost.
11. How do legal guidelines apply to the records? Assess copyright risk: check for reprints/published material, number and identity of potential copyright holders, commercial value, likelihood of receiving significant attention. Can 17 U.S. Code Section 107 (Fair Use) or Section 108 (Reproduction by Libraries and Archives) be applied? Has permission been granted from holding library or archives?
12. How do records retention schedules apply to the records?
13. What restrictions apply to the records? Assess privacy, confidentiality, and personal safety issues: are there Social Security Numbers, individual postal or personal email addresses, or phone numbers? Is Protected Health Information (PHI) present? Is the source a whistleblower?

14. What archival value (informational, evidential, intrinsic, historical) do the records have?

15. What use is anticipated for the records?

### **Policy Implementation and Revision Dates**

The Industry Documents Library Collection Development Policy was drafted on December 13, 2017 and last updated on March 17, 2021. The Policy will be reviewed annually and revised as needed.

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### **References:**

<sup>i</sup> Guidelines for Reappraisal and Deaccessioning, Society of American Archivists, last modified May 2017, [https://www2.archivists.org/sites/all/files/GuidelinesForReappraisalDeaccessioning\\_2017.pdf](https://www2.archivists.org/sites/all/files/GuidelinesForReappraisalDeaccessioning_2017.pdf)

<sup>ii</sup> Core Values Statement and Code of Ethics, Society of American Archivists, last updated March 2018, <https://www2.archivists.org/statements/saa-core-values-statement-and-code-of-ethics>

<sup>iii</sup> ACRL Code of Ethics for Special Collections Librarians, Rare Books and Manuscripts Section, Association of College and Research Libraries, last updated October 2003, [https://rbms.info/standards/code\\_of\\_ethics/](https://rbms.info/standards/code_of_ethics/)