

**October 22, 2021**

**To:** Contract & Grant Officers  
Research Compliance Advisor Committee  
Export Control Officers

**Subject:** Template Foreign Influence Communication Plan

### **Background**

The University of California (UC) is committed to global research and engagement, and recognizes their importance to the University's fundamental core values and mission. UC is aware of the U.S. government's heightened concerns about efforts by some foreign governments to exert undue influence and undermine the integrity of federally funded research. UC acknowledges and understands that these concerns result from actual incidents that violated core research integrity principles.<sup>1</sup> UC also acknowledges the confusion that some faculty, staff and students on our campus locations may have with understanding this complex topic. This guidance provides a template plan for communication to these audiences in an effort to minimize this confusion, enhance understanding, and emphasize resources and contacts on campus location to aid the research community in navigating this area.

### **Purpose**

Develop clear, effective, and regular communication directed toward faculty, students, scholars, staff, leadership, and administrators and training designed to raise awareness about undue foreign influence concerns, federal government disclosure requirements, and associated systemwide and location-specific policies, procedures, and resources.

### **Template Plan**

#### **a. Audiences**

**Primary Audience:** Faculty and other academic appointees, Graduate Students, Postdoctoral Researchers, Visiting Scholars, and others in the campus Research Community

**Secondary Audience:** Research Administrators

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<sup>1</sup> [JCORE Report](#): *Recommended Practices for Strengthening the Security and Integrity of America's Science and Technology Research Enterprise*

## **b. Develop Message(s)**

Messaging should include statements that convey the importance of international research and collaborations in supporting the University's overall mission. It should also acknowledge concerns raised by Federal research sponsors and other government agencies about undue foreign influence as well as emphasize the importance of complying with applicable laws, regulations and UC Policies, inclusive of disclosure requirements. An example of such a statement may be:

**[Insert campus/location name] is committed to global research and collaboration as it is fundamental to our core values and research mission. We are dedicated to academic freedom and an open, nondiscriminatory academic environment and we embrace and promote international collaboration. However, we must recognize and address U.S. government concerns that some foreign entities and governments may attempt certain actions to gain advantages by inappropriately acquiring technical knowledge, information, and access to intellectual property. These activities compromise U.S. competitiveness and threaten our national and economic security. Federal funding agencies have made institutions of higher education keenly aware of their continuing expectations that grantees disclose all foreign financial conflicts of interest, other financial support, foreign components, conflicts of commitment, and other foreign affiliations. [Insert campus/location name] must continue to vigorously support our international research and collaborations, while also ensuring that we and our research community comply with all federal regulations, laws and UC policies, particularly with respect to disclosure expectations.**

## **c. Topics**

As part of their training, communications, and awareness campaigns, campuses should consider including, but are not limited to, the following:

- Applicable disclosure requirements related to financial interests in, appointments to, affiliations with, support received from, and work conducted with foreign entities;
- Guidance regarding required disclosures in the areas of Conflict of Interest, Conflict of Commitment, Other Support, foreign travel, Foreign Components, and Foreign Talent programs;
- Guidance regarding Export Controls, including Federal rules governing the transfer of controlled information, technologies and commodities overseas or to foreign nationals in the U.S.; and
- Reminders of the importance of complying with Federal government requirements of confidentiality and non-disclosure in the peer review process.

## **d. Communication**

1. **Channels/Formats:** Locations should consider their campus cultures and infrastructures in determining which forms, formats, or channels of communication to use. Possibilities include but are not limited to: Campus-wide announcements, targeted

emails, workshops, webinars, meetings, awareness campaigns, electronic mailing lists, Town Halls, and one-on-one discussions. As a best practice, locations are encouraged to document all communication materials, training events, announcements, and memos.

2. **Materials:** Materials that can be utilized include but are not limited to: slide presentations, newsletters, memos, policies, procedures, best practices, announcements, meeting agendas and regulatory updates. Locations should always include local points of contact for questions, concerns, comments by their research community. These points of contact may include Research Compliance and Integrity Officers, Export Control Officers, Conflict of Commitment Coordinators, Conflict of Interest Coordinators, International Offices, Vice Chancellors for Research and/or their delegates. The Office of Ethics, Compliance & Audit Services (ECAS) in partnership with the Research Policy Analysis & Coordination (RPAC) unit at the University of California Office of the President (UCOP) will create and share a repository of materials that locations can use and build upon.
3. **Timing/Frequency:** Locations should determine the best frequency of messaging based on local structure, resources, audience and research portfolio. Locations should consider annual messaging to the research community to stress the importance of this issue with additional communications to smaller or more targeted audiences throughout the year.

#### **e. Establish Partnerships**

Locations should establish partnerships with all offices/units that have an interest in compliance with foreign influence disclosure obligations, as each may have access to different audiences needing the information. These offices/units may include: Academic Personnel, Dean's Offices, Provost's Offices, Offices of Research, Communications, Graduate Division, Global Engagement/International Offices, Risk Management, Campus Counsel/Legal Affairs, Sponsored Projects Offices, Technology Transfer Offices, and Research Compliance and Integrity Offices. We recommend coordinated messaging, training and education on this topic across all relevant offices/units to ensure consistency and avoid redundancy. UCOP will work with campus locations to establish harmonized messaging and communications.

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A handwritten signature in black ink, appearing to read 'Deborah Motton', with a long horizontal flourish extending to the right.

Deborah Motton  
Executive Director  
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