



March 19, 2024

To: Deans, Directors, Department Chairs, Administrative Officers, and Faculty

Re: Foreign Engagement

Dear Colleagues:

We are writing to follow up on previous communications from UCLA leaders about issues related to international research and collaborations. UCLA remains committed to establishing and maintaining scholarly exchanges, collaborative research, and affiliations with foreign institutions. We cherish the open research environment that is part of what makes us a world-class academic institution. At the same time, we recognize that federal agencies and Congress remain concerned about undue foreign influence and the adequacy of research security in the United States university research environment. As good stewards of the research funding support we receive, we need to be responsive to these concerns.

There have been new requirements over the past few years that impact individual researchers (see below), and others that compel changes at the institutional level. Some federal research sponsors like the National Institutes of Health (NIH), the National Science Foundation (NSF), and the Department of Defense (DOD) have enhanced their reporting requirements for individual investigators. National Security Presidential Memorandum 33 ([NSPM-33](#)), issued in January 2021, mandates the establishment of research security programs at institutions like UCLA that receive federal research. In addition, UC Office of the President established new requirements and procedures for approving international affiliations and agreements involving emerging technology and countries of concern.

The Office of the Vice Chancellor for Research and Creative Activities has taken the lead in designing a campus research security program that will support the UCLA research community and foster foreign collaborators, while also protecting the UCLA open research environment. UCLA's participation in organizations like the Association of American Universities (AAU), the Association of Public and Land-Grant Universities (APLU), and the Council on Government Relations (COGR) ensures that, together with other universities, our feedback and concerns about the impact of proposed new regulations on our researchers and institution are communicated to the federal government. Additionally, UCLA Government Relations represents and advocates on behalf of the campus in engaging with members of Congress and their staffs, the White House, and the Executive Branch agencies to promote our mission.

We know that these are complex issues, and we will provide additional updates about this evolving landscape. The information outlined below is intended to provide an overview of key disclosure obligations and other requirements related to foreign engagement. Please understand that the information is not exhaustive and that this is an area of rapid change.

Proposals and Awards for Research Support

- All UCLA employees who receive part of their salary through the University, or whose activities use any campus resources or facilities, must submit proposals for extramural support through the authorized University contracts and grants office with resulting awards made to “The Regents of the University of California.” Exceptions may be granted in unusual circumstances on a case-by-case basis. See [UCLA Policy 909](#), “Requirement to Submit Proposals and to Receive Awards for Grants and Contracts through the University.”
- PIs and senior/key personnel¹ must disclose all [current and pending \(other\) support](#) to federal sponsors. This includes all resources made available in support of the individual’s research efforts, including foreign and domestic resources, as well as resources being made available outside of UCLA, either through another entity, or directly to the individual. It also includes in-kind contributions that require a time commitment and directly support the individual’s research and development efforts (e.g., the provision of office or laboratory space, equipment, supplies, employees/students, or travel).
- Current and Pending (Other) Support [Disclosures](#) must be updated at the request of the Federal research funding agency prior to the award of support and at any subsequent time the agency determines appropriate during the term of the award.
- Additionally, all research proposals submitted to federal agencies must include a current [Biosketch](#) for the PI and all other senior/key personnel. All academic, professional, or institutional appointments and positions should be listed. This includes any academic, professional, or institutional positions (with or without compensation) and whether full-time, part-time, or voluntary (including adjunct, visiting, or honorary). Consistent with NSPM-33, individuals are required to disclose contracts associated with participation in programs sponsored by foreign governments, instrumentalities, or entities, including [foreign government-sponsored talent recruitment programs](#).

Conflict of Commitment

- Eligible faculty members should request prior approval for, and report, outside professional activities through the UC Outside Activity Tracking System ([OATS](#)). See [APM 671](#) (Conflict of Commitment and Outside Activities of Health Sciences Compensation Plan Participants) for members of Health Science Compensation Plans and [APM 025](#) (Conflict of Commitment and Outside Activities of Faculty Members) for all other faculty.

¹ Individual who (a) contributes in a substantive, meaningful way to the scientific development or execution of a research and development project proposed to be carried out with a research and development award from a Federal research agency; and (b) is designated as a covered individual by the Federal research agency concerned.

- Activities that require prior approval include:
 - Teaching, research, or administration of a grant at another educational institution, trust, organization, government agency, foundation, or other entity outside of the University;
 - Employment outside of the University;
 - Assuming a founding or a co-founding role of a company;
 - Assuming an executive or managerial position outside of the University;
 - Current or pending acceptance of an honorary, visiting, adjunct, or other institutional appointment (compensated or uncompensated) at an outside institution of higher education, research institute, or medical center (*effective July 1, 2024*);
 - Current or pending participation in, or application to, talent recruitment programs sponsored by a non-U.S. government agency (*effective July 1, 2024*).
- Activities for which prior approval is not required, but must be reported annually, include, but are not limited to:
 - Providing outside consulting services or referrals or engaging in professional practice as an individual or through a single member professional corporation or sole proprietorship;
 - Serving on a board of directors outside of the University; and
 - Providing or presenting a workshop for industry.

See [UCLA Academic Affairs and Personnel](#) for policies, forms, and guidance.

Disclosure of Financial Interests

- Principal Investigators and others who share responsibility for the design, conduct and reporting of federal Public Health Service-supported research (including NIH) and Department of Energy (DOE) must disclose all personal financial interests related to the breadth of their institutional responsibilities, through the [electronic Disclosure Gateway \(eDGE\) system](#). Required disclosures include income and travel reimbursement from foreign academic institutions.
- Principal Investigators must disclose financial interests in the sponsor of any research contract or grant from a for-profit, non-profit or a Material Transfer Agreement. They must also disclose financial interest in entities that provide support for research through gifts. They must also disclose financial interests in the entity providing the support in accordance with [UCLA Procedure 925.1](#) and [UCLA Procedure 925.2](#).
- Principal Investigators and others who share responsibility for designing, conducting and reporting research supported by all other federal agencies (except PHS and DOE) must disclose personal financial interests in accordance with [UCLA Procedure 925.3](#).

Other Matters

- University policy prohibits acceptance of publication restrictions in research, except in extraordinary circumstances. Only University officials authorized by the Regents to accept

contracts and grants may agree to such restrictions. Researchers should never enter into informal or unofficial agreements to restrict publication or sharing of research results.

- All UCLA employees must comply with U.S. export control regulations and sanctions in the conduct of University business, including conducting research; traveling internationally and attending conferences; participating in international collaborations; using proprietary information; working with international staff and students; hosting international visitors; shipping materials internationally; and engaging in any international transactions.
- All academic appointees, staff, and trainees should register all travel for University purposes and follow the guidelines for travel to high-risk countries set by the U.S. Department of State or UC Policy. Familiarity with current policies and IT advisories can help ensure that sensitive data are protected. See the Insurance & Risk Management's [Travel Insurance guidelines](#).
- All employees are expected to promptly disclose all intellectual property, any improvements to existing intellectual property, and any potentially patentable inventions (whether or not UC resources are utilized) to the UCLA Technology Development Group (TDG) via the [Invention Disclosure web portal](#).
- Faculty and staff must follow appropriate procedures when inviting visitors to laboratories and offices that house sensitive and proprietary data and equipment to ensure that data and systems are properly used and protected. See the [Visiting Graduate Researchers](#) and [Appendix 39: Visiting Scholars](#).
- Any academic Memorandums of Understanding (MOU), Collaboration Agreements, Affiliation Agreements, and Student Exchange Agreements involving a foreign organization should be forwarded to the UCLA Office of International Studies and Global Engagement ([International Office](#)) for review. See [UCLA Policy 980](#), "International Academic Agreements."
- All affiliations and agreements with international affiliations and engagements relating to emerging technology and involving countries of concern must be vetted, approved by the Chancellor, and submitted to the UC Office of the President for review and approval.²

Additional information is available on the [UCLA Foreign Engagement website](#), the [Export Control website](#), and the [OCGA Other Support](#) webpages.

² Emerging technologies have been defined as listed by the Department of Commerce, Bureau of Industry and Security in 83 FR 58201, including but not limited to Artificial Intelligence (AI) and Machine Learning, Quantum Information/Sensing, Semiconductor and Microelectronics, Biotechnology, and other areas that can be identified by the Export Control office based on evolving federal government classification of emerging technology important to national security. Countries of concern include Qatar, Saudi Arabia, United Arab Emirates, the People's Republic of China (including Hong Kong and Macau), the Democratic People's Republic of Korea (North Korea), the Russian Federation, and the Islamic Republic of Iran.

From EVCP Hunt/VC Wakimoto: Memo re: foreign engagement

March 19, 2024

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Sincerely,

A handwritten signature in black ink, appearing to be 'D. Hunt', written in a cursive style.

Darnell M. Hunt
Executive Vice Chancellor and Provost

A handwritten signature in black ink, reading 'Roger M. Wakimoto', written in a cursive style.

Roger Wakimoto
Vice Chancellor for Research and Creative Activities