



Audit and Compliance Committee Meeting

Julie Leftheris, Inspector General

and Director of Compliance

June 22, 2023

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Foreign Influence Prevention in the State University System

Foreign Influence Laws



- Increased Disclosures
- Greater Examination
- Scrutiny of Researchers
- Preapproval of Foreign Travel

Oversight & Accountability



Audits & Inspections

**Enforcement and Sanction
by Board of Governors**

**Civil Penalties for
Noncompliance**

**Rewards for Whistle-blowers
who report undisclosed gifts**



Foreign Gift Reporting

(section 1010.25, Florida Statutes)

Statutory Requirements



Semiannual Reporting



Gifts Valued at
\$50,000 or more

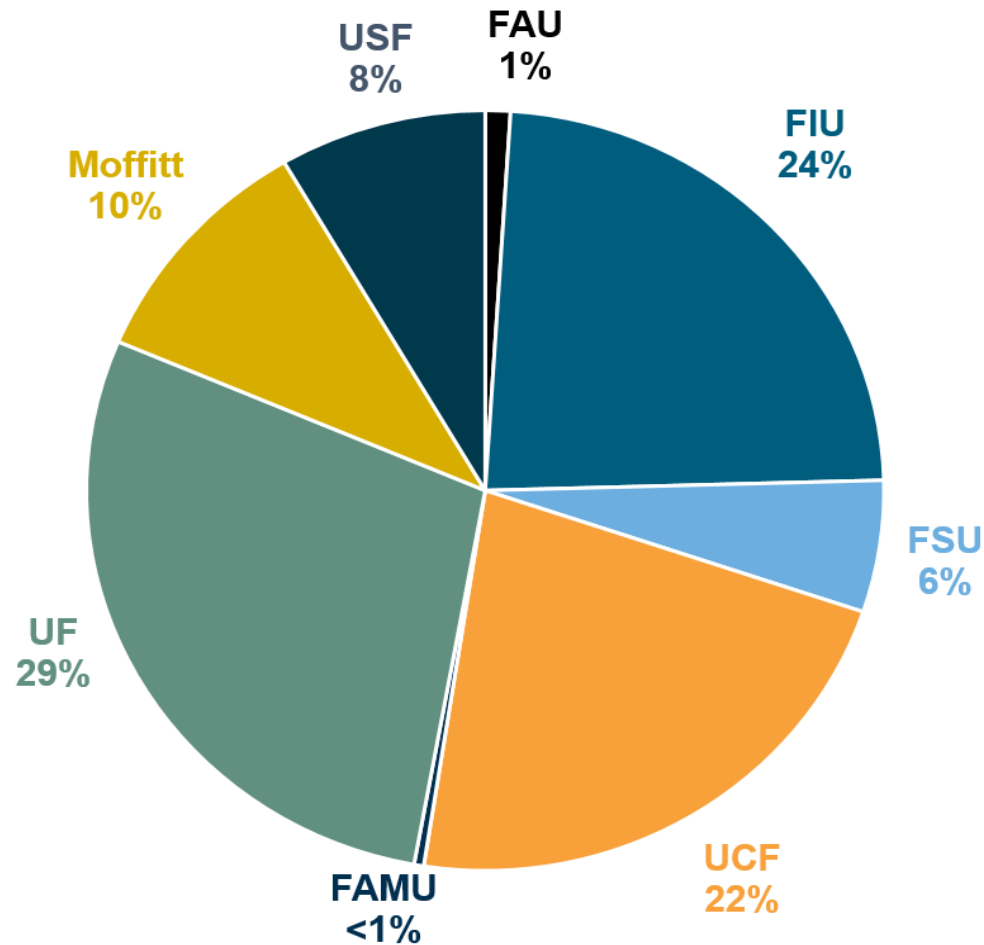


Annual Inspection

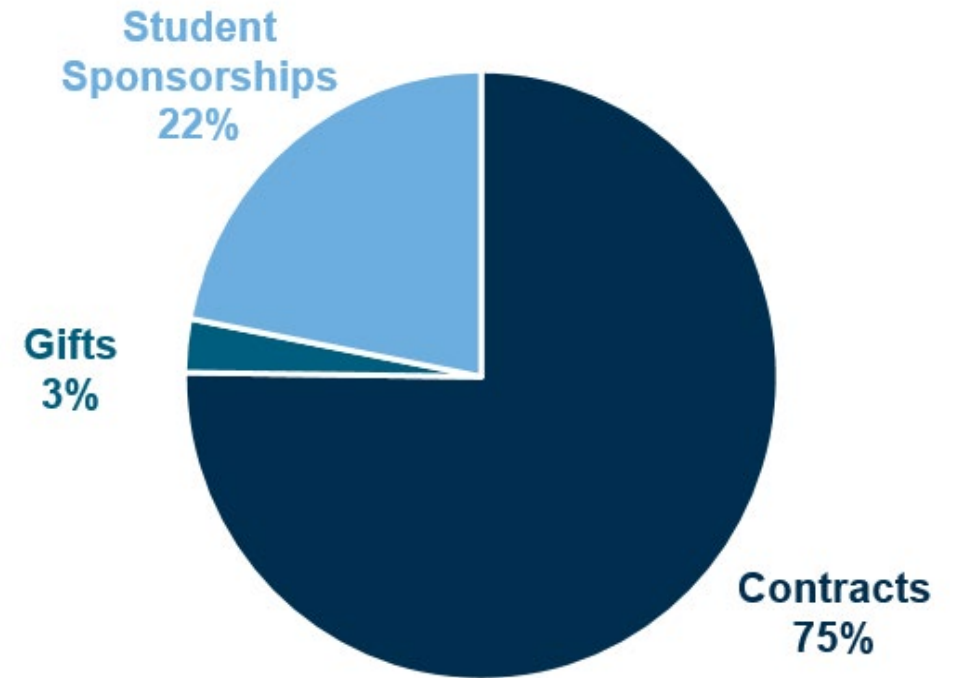
First Year Inspection (FY 2021-2022)



Total Funds by SUS IHE



Total Funds by Gift Type



First Year Inspection (FY 2021-2022)

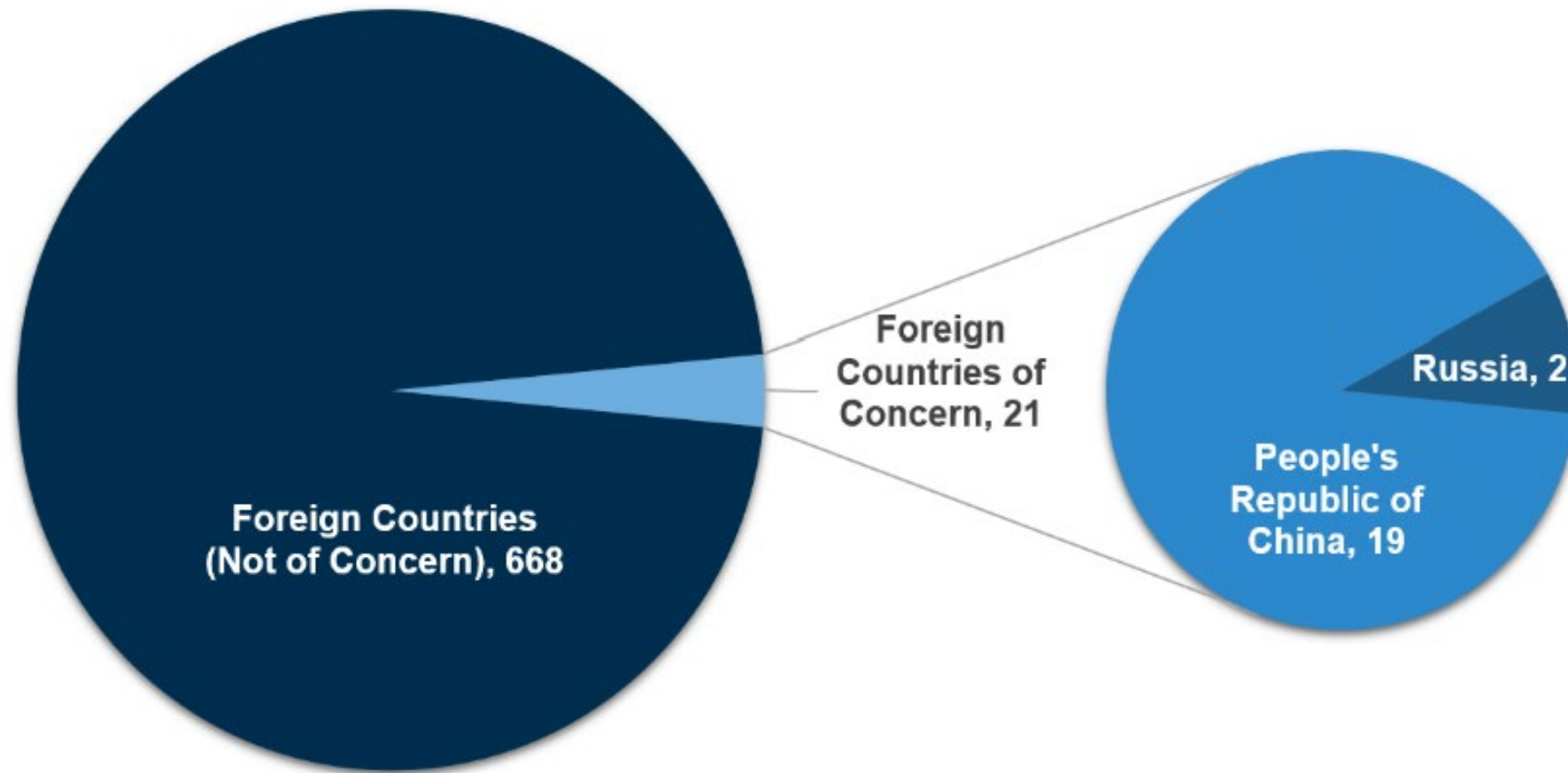


SUS IHE	Foreign Gift Types:			Total	Total Value
	Contracts	Gifts	Student Sponsorships		
FAMU	0	0	2	2	\$457,753
FAU	4	0	4	8	1,184,344
FIU	73	16	16	105	27,454,483
FSU	19	4	2	25	6,529,185
Moffitt	105	1	0	106	11,872,278
UCF	85	0	12	97	25,987,416
UF	270	4	30	304	33,270,921
USF	23	1	18	42	9,802,855
Totals	579	26	84	689	\$116,599,235

First Year Inspection (FY 2021-2022)



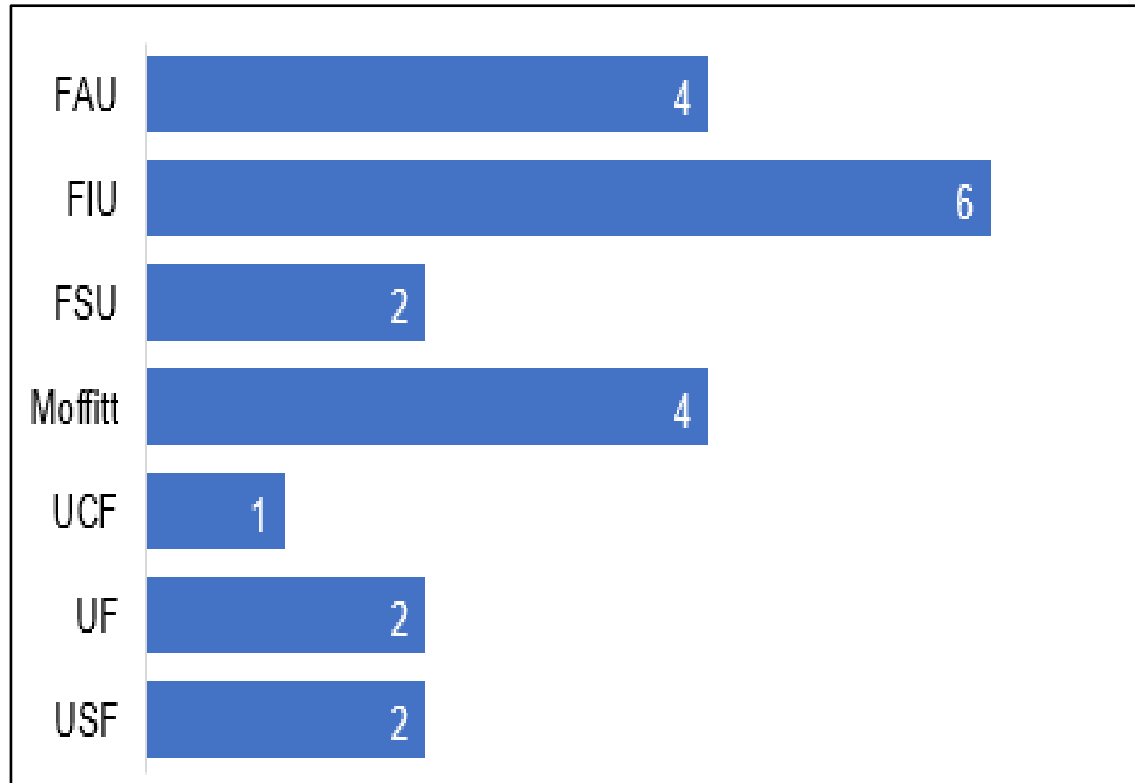
Disclosures Involving Foreign Countries of Concern



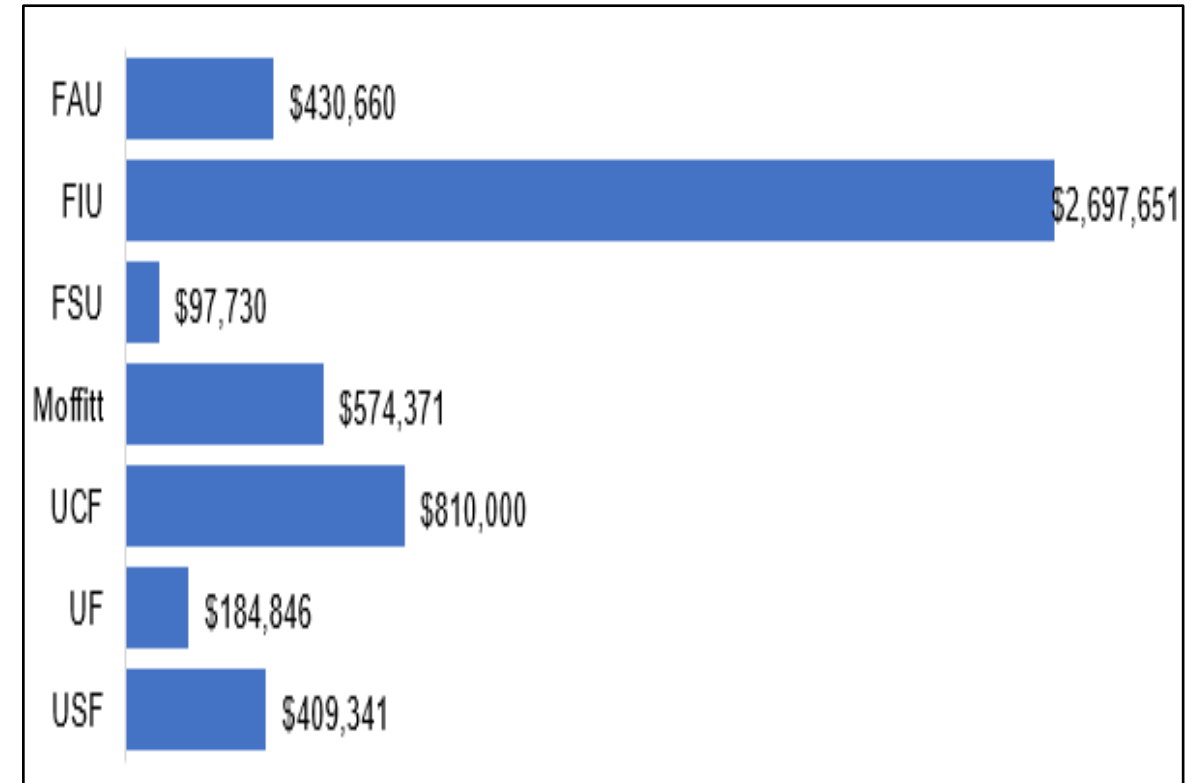
First Year Inspection (FY 2021-2022)



Foreign Country of Concern Disclosures by IHE



Foreign Country of Concern Disclosures by Monetary Value





Gift Disclosures Involving Foreign Countries of Concern

Gift Purpose	Total Number	Cumulative Monetary Value
Goods or Services Purchased from a Private Company	9	\$887,900
Agreements for Donation of Artwork	1	\$700,000
Collaborative Degree Programs with Chinese Universities	3	\$1,922,840
Research Agreements with Chinese Companies and Universities	3	\$944,846
Clinical Trial Agreements with Chinese Companies	5	\$699,013



Foreign Researchers & Travel

(Sections 1010.25 & 1010.36, Florida Statutes)

Statutory Requirements



Foreign
Researcher
Screening



International
Travel
Approval &
Monitoring
Program



Report of
Foreign
Travel to
Countries
of Concern



New Legislation



Senate Bill 846 - *Agreements of Educational Entities with Foreign Entities*

- Requires Board of Governors' approval of grants, agreements, and partnerships with colleges or universities based in a foreign country of concern or with a foreign principal.
- Prohibits certain gifts from colleges or universities based in a Foreign Country of Concern or from a Foreign Principal.
- Prohibits state universities and their employees or representatives from soliciting or accepting any gifts* from colleges or universities based in a foreign country of concern or from a foreign principal.

**Gift = transfer of money or property without compensation*



Foreign Influence Red Flags Program

Rhonda L. Bishop

Vice President, Compliance, Ethics, and Risk

UCF Outside Activity, Employment, and Conflict of Interest and Commitment Disclosure

❖ Required to Disclose:

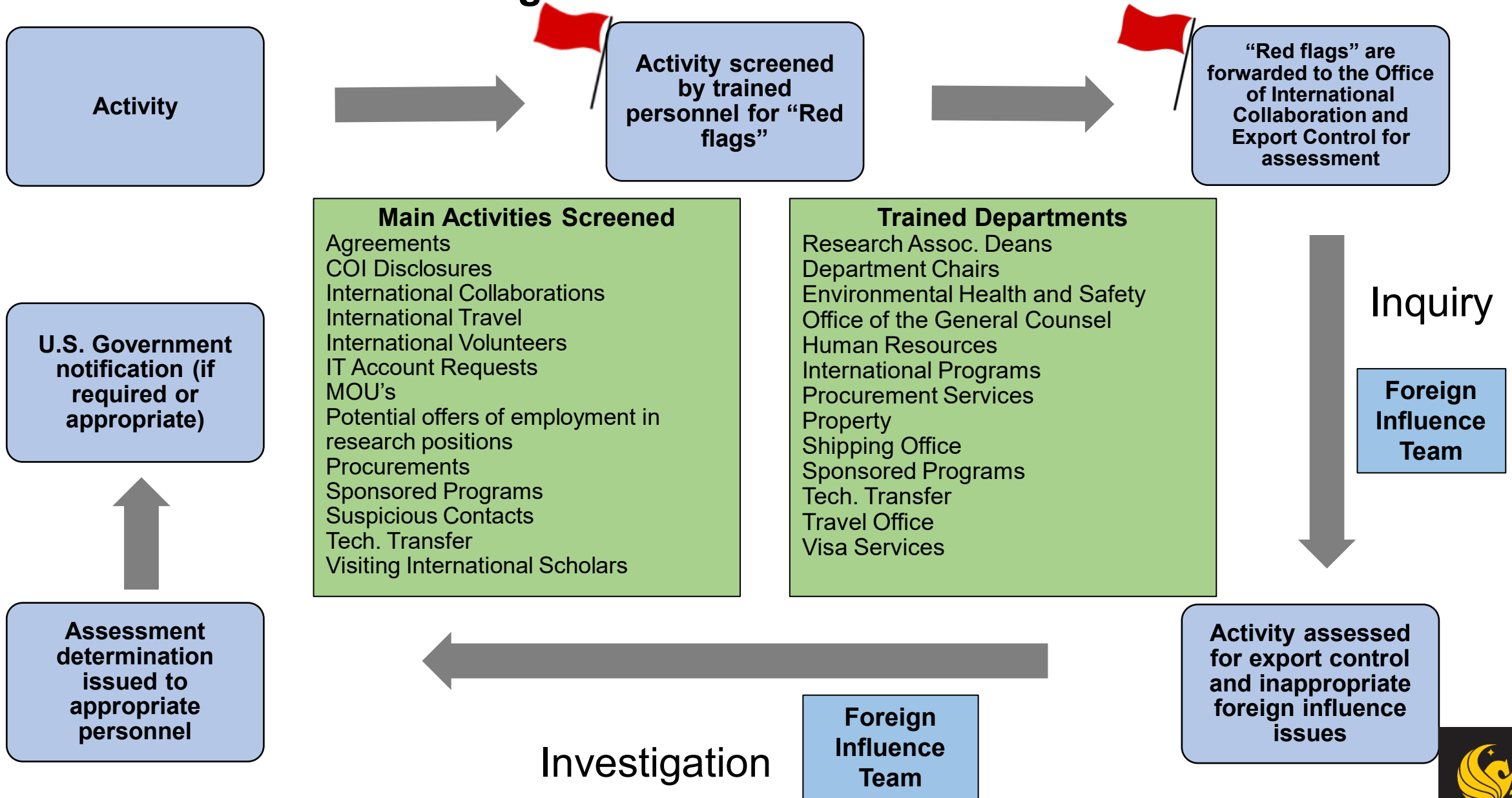
- Faculty
- Executive service
- Post-doctoral employees
- Employees identified in university positions of trust
- Employee types engaged in the design, conduct, and reporting of research at UCF

❖ The online system:

- October 2009, online disclosure system launched
- Questions driven by state and federal requirements
- Centralized oversight by Compliance
- Targeted questions for activities with foreign entities or individuals
- Disclosure matrix supports reporting



Foreign Influence Review Process



Foreign Influence Red Flags



Affiliation with an entity or individual designated as a threat to national security

Faculty member hosting visiting scholars from an entity designated as a threat to national security

Hiring a scholar or student that does not appear to be qualified to perform the duties

Information indicating an affiliation with a foreign talent program, foreign awards program, or an undisclosed appointment at a foreign university or entity

Not disclosing personnel participating on an export-controlled project

Omission of certain information (i.e., publications and presentations) from resumes/curriculum vitae

Receiving funding from a foreign government

Submission of false or inaccurate information in shipment records

Traveling to and/or financial dealings in a country that the U.S. government has designated as a threat to national security

Undisclosed affiliations with foreign entities or individuals

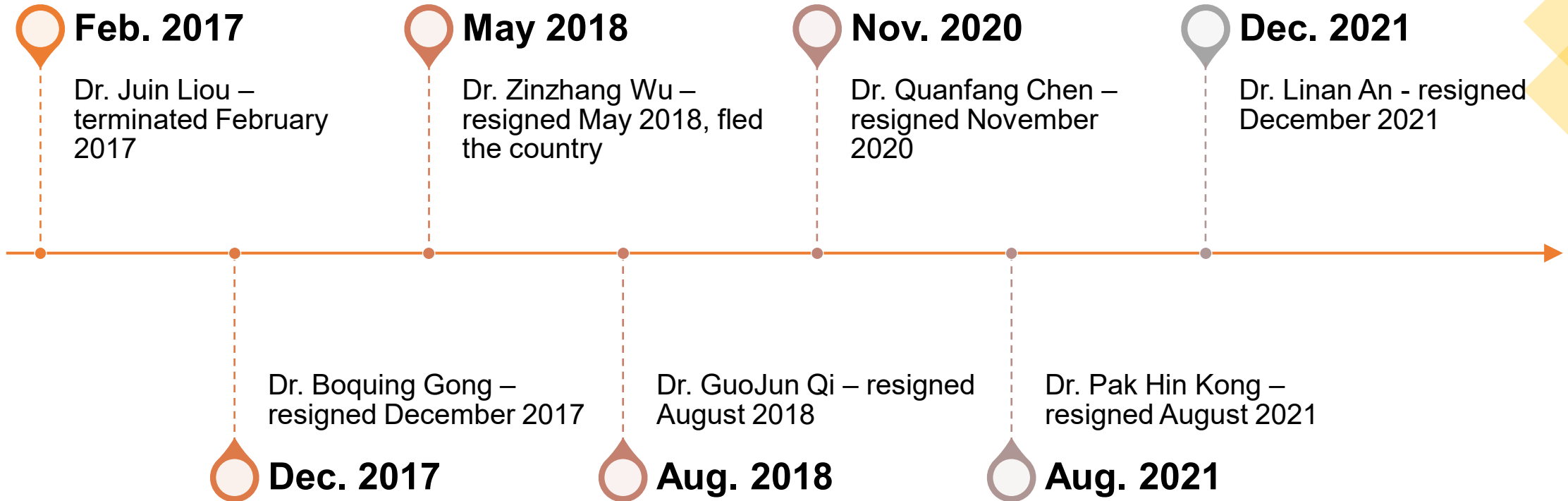
Undisclosed affiliations with foreign universities

Unexplained sources of financial support

Key Aspects of UCF's Foreign Influence Program

- Training to help employees identify inappropriate foreign influence and ways to mitigate
- Key personnel trained to identify and report red flags
- Talent program questionnaire and attestation
- Dedicated website for protecting against foreign influence
- Partnerships and regular meetings with federal partners
- Risk assessments and investigations, as appropriate
- Continued assessment of the program and changes as needed

Closed Foreign Influence Investigations



❖ Two faculty actively under a corrective action plan.



Panelists



Rhonda Bishop

- Vice President for University Compliance, Ethics, and Risk
- University of Central Florida



Caroline Fultz-Carver

- Chief Compliance Officer
- University of South Florida



David Norton

- Vice President for Research
- University of Florida



Andrés Gil

- Sr. Vice President for Research & Economic Development
- Florida International University



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