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**

- UF (29%)
- UCF (22%)
- FSU (6%)
- FIU (24%)
- Moffitt (10%)
- FAU (1%)
- USF (8%)
- FAMU (<1%)

**Total Funds by Gift Type**

- Contracts (75%)
- Gifts (3%)
- Student Sponsorships (22%)
## First Year Inspection (FY 2021-2022)

<table>
<thead>
<tr>
<th>SUS IHE</th>
<th>Contracts</th>
<th>Gifts</th>
<th>Student Sponsorships</th>
<th>Total</th>
<th>Total Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>FAMU</td>
<td>0</td>
<td>0</td>
<td>2</td>
<td>2</td>
<td>$457,753</td>
</tr>
<tr>
<td>FAU</td>
<td>4</td>
<td>0</td>
<td>4</td>
<td>8</td>
<td>1,184,344</td>
</tr>
<tr>
<td>FIU</td>
<td>73</td>
<td>16</td>
<td>16</td>
<td>105</td>
<td>27,454,483</td>
</tr>
<tr>
<td>FSU</td>
<td>19</td>
<td>4</td>
<td>2</td>
<td>25</td>
<td>6,529,185</td>
</tr>
<tr>
<td>Moffitt</td>
<td>105</td>
<td>1</td>
<td>0</td>
<td>106</td>
<td>11,872,278</td>
</tr>
<tr>
<td>UCF</td>
<td>85</td>
<td>0</td>
<td>12</td>
<td>97</td>
<td>25,987,416</td>
</tr>
<tr>
<td>UF</td>
<td>270</td>
<td>4</td>
<td>30</td>
<td>304</td>
<td>33,270,921</td>
</tr>
<tr>
<td>USF</td>
<td>23</td>
<td>1</td>
<td>18</td>
<td>42</td>
<td>9,802,855</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>579</strong></td>
<td><strong>26</strong></td>
<td><strong>84</strong></td>
<td><strong>689</strong></td>
<td><strong>$116,599,235</strong></td>
</tr>
</tbody>
</table>
Disclosures Involving Foreign Countries of Concern

- Foreign Countries of Concern, 21
- People’s Republic of China, 19
- Russia, 2

Foreign Countries (Not of Concern), 668
First Year Inspection (FY 2021-2022)

Foreign Country of Concern Disclosures by IHE

- FAU: 4
- FIU: 6
- FSU: 2
- Mofitt: 4
- UCF: 1
- UF: 2
- USF: 2

Foreign Country of Concern Disclosures by Monetary Value

- FAU: $430,560
- FIU: $2,697,651
- FSU: $97,730
- Mofitt: $574,371
- UCF: $810,000
- UF: $184,846
- USF: $409,341
Gift Disclosures Involving Foreign Countries of Concern

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

Activity screened by trained personnel for “Red flags”

“Red flags” are forwarded to the Office of International Collaboration and Export Control for assessment

Main Activities Screened
- Agreements
- COI Disclosures
- International Collaborations
- International Travel
- International Volunteers
- IT Account Requests
- MOU’s
- Potential offers of employment in research positions
- Procurements
- Sponsored Programs
- Suspicious Contacts
- Tech. Transfer
- Visiting International Scholars

Trained Departments
- Research Assoc. Deans
- Department Chairs
- Environmental Health and Safety
- Office of the General Counsel
- Human Resources
- International Programs
- Procurement Services
- Property
- Shipping Office
- Sponsored Programs
- Tech. Transfer
- Travel Office
- Visa Services

Foreign Influence Team

U.S. Government notification (if required or appropriate)

Assessment determination issued to appropriate personnel

Activity assessed for export control and inappropriate foreign influence issues

Investigation

Inquiry
Foreign Influence Red Flags

<table>
<thead>
<tr>
<th>Affiliation with an entity or individual designated as a threat to national security</th>
<th>Faculty member hosting visiting scholars from an entity designated as a threat to national security</th>
<th>Hiring a scholar or student that does not appear to be qualified to perform the duties</th>
</tr>
</thead>
<tbody>
<tr>
<td>Information indicating an affiliation with a foreign talent program, foreign awards program, or an undisclosed appointment at a foreign university or entity</td>
<td>Not disclosing personnel participating on an export-controlled project</td>
<td>Omission of certain information (i.e., publications and presentations) from resumes/curriculum vitae</td>
</tr>
<tr>
<td>Receiving funding from a foreign government</td>
<td>Submission of false or inaccurate information in shipment records</td>
<td>Traveling to and/or financial dealings in a country that the U.S. government has designated as a threat to national security</td>
</tr>
<tr>
<td>Undisclosed affiliations with foreign entities or individuals</td>
<td>Undisclosed affiliations with foreign universities</td>
<td>Unexplained sources of financial support</td>
</tr>
</tbody>
</table>
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

- **Feb. 2017**: Dr. Juin Liou – terminated February 2017
- **May 2018**: Dr. Zinzhang Wu – resigned May 2018, fled the country
- **Nov. 2020**: Dr. Quanfang Chen – resigned November 2020
- **Dec. 2021**: Dr. Linan An - resigned December 2021
- **Dec. 2017**: Dr. Boquing Gong – resigned December 2017
- **Aug. 2018**: Dr. GuoJun Qi – resigned August 2018
- **Aug. 2021**: Dr. Pak Hin Kong – resigned August 2021

- Two faculty actively under a corrective action plan.
SUS Foreign Influence Panel Discussion

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