

# 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



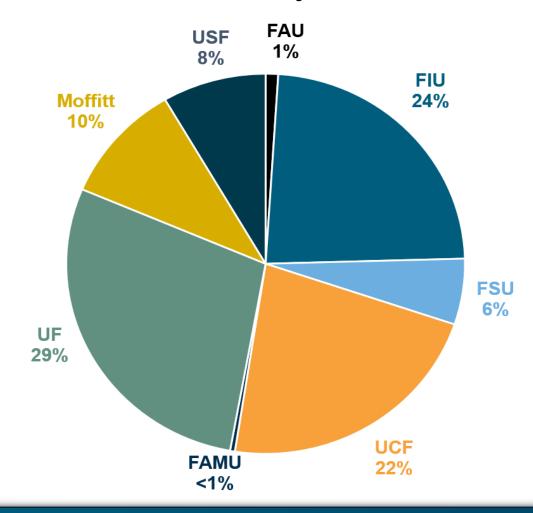
Gifts Valued at \$50,000 or more



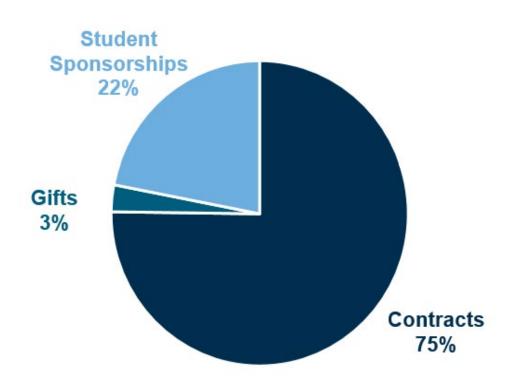
**Annual Inspection** 



### Total Funds by SUS IHE



### Total Funds by Gift Type

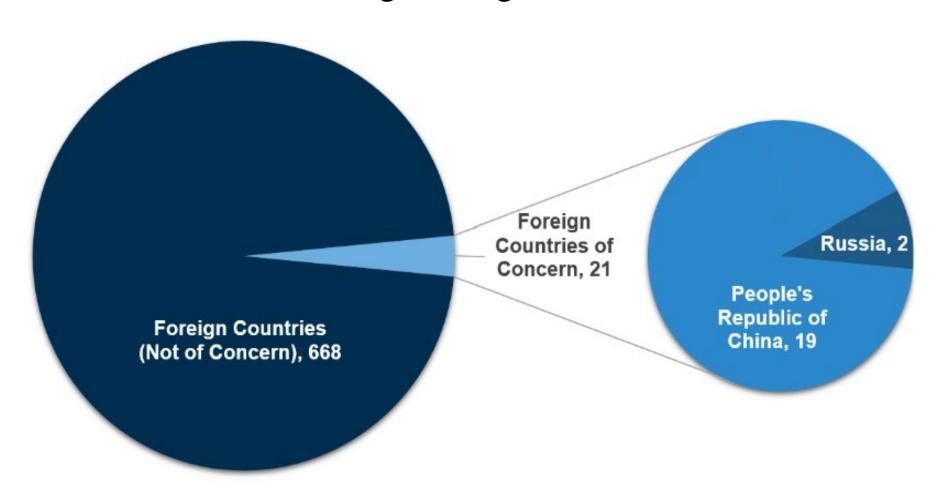




SUS IHE	Foreign Gift Types:			Total	Total Value
	Contracts	Gifts	Student Sponsorships	Total	Total value
FAMU	0	0	2	2	\$457,753
FAU	4	0	4	8	1,184,344
FIU	73	16	16	105	27,454,483
FSU	19	4	2	25	6,529,185
Moffitt	105	1	0	106	11,872,278
UCF	85	0	12	97	25,987,416
UF	270	4	30	304	33,270,921
USF	23	1	18	42	9,802,855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

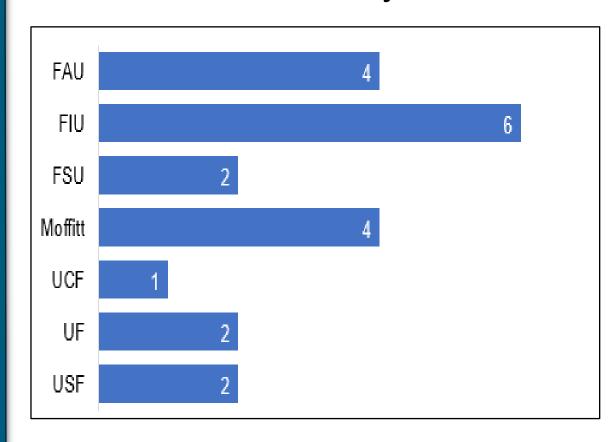


### Disclosures Involving Foreign Countries of Concern

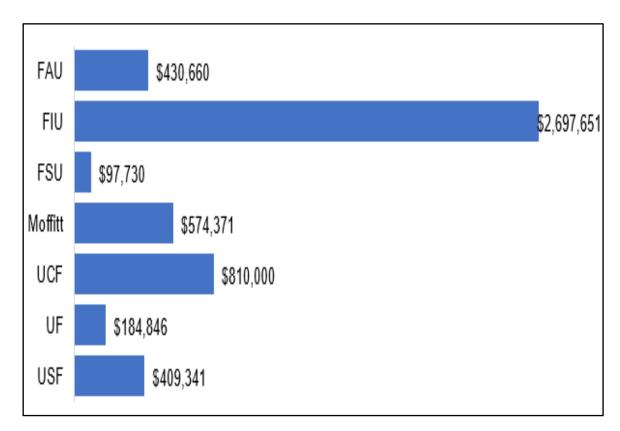




# Foreign Country of Concern Disclosures by IHE



### 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

## 2023 Legislative Activity



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

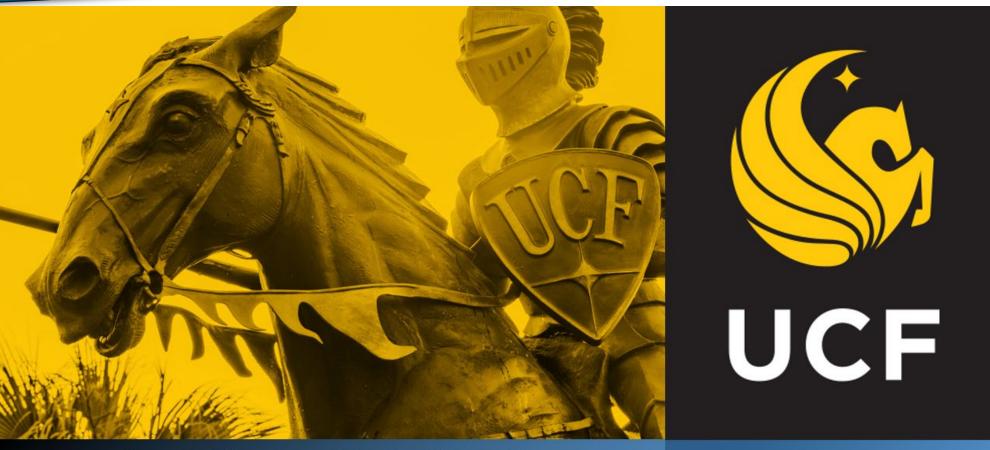
- Requires Board of Governors' approval of grants, agreements, and partnerships with colleges or universities based in a foreign country of concern or with a foreign principal.
- Prohibits certain gifts from colleges or universities based in a Foreign Country of Concern or from a Foreign Principal.

 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

## Institutional Highlight





### Foreign Influence Red Flags Program

Rhonda L. Bishop Vice President, Compliance, Ethics, and Risk

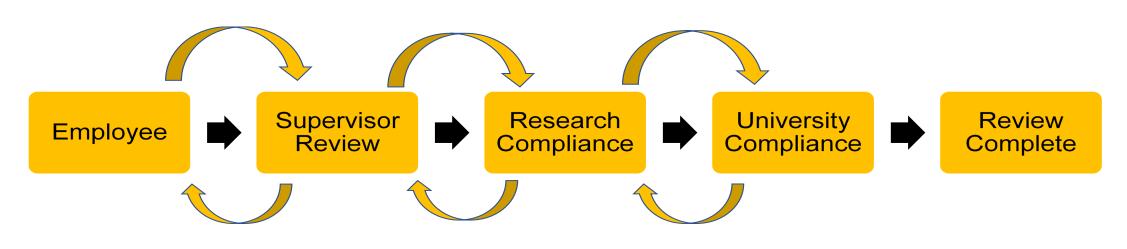
## UCF Outside Activity, Employment, and Conflict of Interest and Commitment Disclosure

#### 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"

**Activity** 

Main Activities Screened

International Collaborations

Potential offers of employment in

Visiting International Scholars

International Volunteers

International Travel

**IT Account Requests** 

research positions

**Sponsored Programs** 

**Suspicious Contacts** 

**Procurements** 

Tech. Transfer

Agreements
COI Disclosures

MOU's

tivities Screened 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

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



Assessment determination issued to appropriate personnel

Investigation

Foreign Influence Team "Red flags" are forwarded to the Office of International Collaboration and Export Control for assessment

Inquiry

Foreign Influence Team

Activity assessed for export control and inappropriate foreign influence issues



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

## Foreign Influence Red Flags



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 exportcontrolled 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**

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



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