

International Risk Assessment

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Background

- 8/2018 – NIH Letter Expresses Concern Over Foreign Entities' Efforts to Exploit and Influence U.S. Research
- 2019 – NSF, DoD, and DOE Share Similar Concerns
- 2019 – Federal Agencies Update Rules Regarding Disclosure of Foreign Activities, Other Support, and Foreign Components within Federally Funded Research Projects
- Sept. 2019 – White House OSTP Issues Letter Announcing Federal-Wide Efforts to Address University Disclosure Requirements, Best Practices, and Risk Management

In The News

MD Anderson ousts 3 scientists over concerns about Chinese conflicts of interest



2 Emory researchers didn't disclose Chinese funding, ties



University of Kansas Researcher Indicted for Fraud for Failing to Disclose Conflict of Interest with Chinese University



How UF is Addressing the Concerns

Continuing Existing Activities	Implementing New Activities
Export Controls Compliance	Increased awareness across campus
Foreign visitor reviews in high-risk areas	Cooperated with federal authorities and participate in working groups at the national level
Classified and Controlled Unclassified Information security protections	Created a website to share information concerning the foreign influence threat and disclosure requirements
Risk reviews for foreign-sponsored and located research projects	Developed and implemented a new electronic disclosure system for the disclosure of outside interests
VISA requirements management for foreign students and employees	Developed an international risk assessment process that provides screening of activities with foreign institutions, as well as assessment of conflicts of interest or commitment

- UF Agreements (Phase 1)**
- Research agreements
 - Clinical trial agreements
 - MTAs
 - MOUs
 - Cooperative agreements
 - Data use agreements
 - Non-disclosure agreements
 - Licensing agreements
 - Gift agreements
 - UFIC Agreements

Core Office Review International?

- Faculty Agreements (Phase 2)**
- Employment agreements
 - Consulting agreements
 - Service on Board of Directors
 - Equity ownership of company
 - Agreements that invoke assignment of intellectual property
 - Agreements to supervise persons or programs in other countries
 - Agreements to host persons from other countries in UF labs
 - Living expense/housing agreement
 - Cooperative agreements
 - Non-disclosure agreements
 - Assignment of titled position (e.g. professor) at another institution

Initial Review

Does the project:

- Occur in a comprehensively sanctioned country?
Or
- Occur in a country that has a Dept of State Level 4 travel warning?
Or
- Involve Restricted Parties?
Or
- Include travel for one or more months/year?
Or
- Have other high risk factors?

Level 1 Review (Assistant Director Level)
Risk Assessment w/ Matrix

Medium

Discretionary Referral

Advisory Group Review
Institutional Risk?

High

Low

Medium

Discretionary Referral

VPR & Provost Review
Acceptable Institutional Risk?

No

Deny Activity

Yes

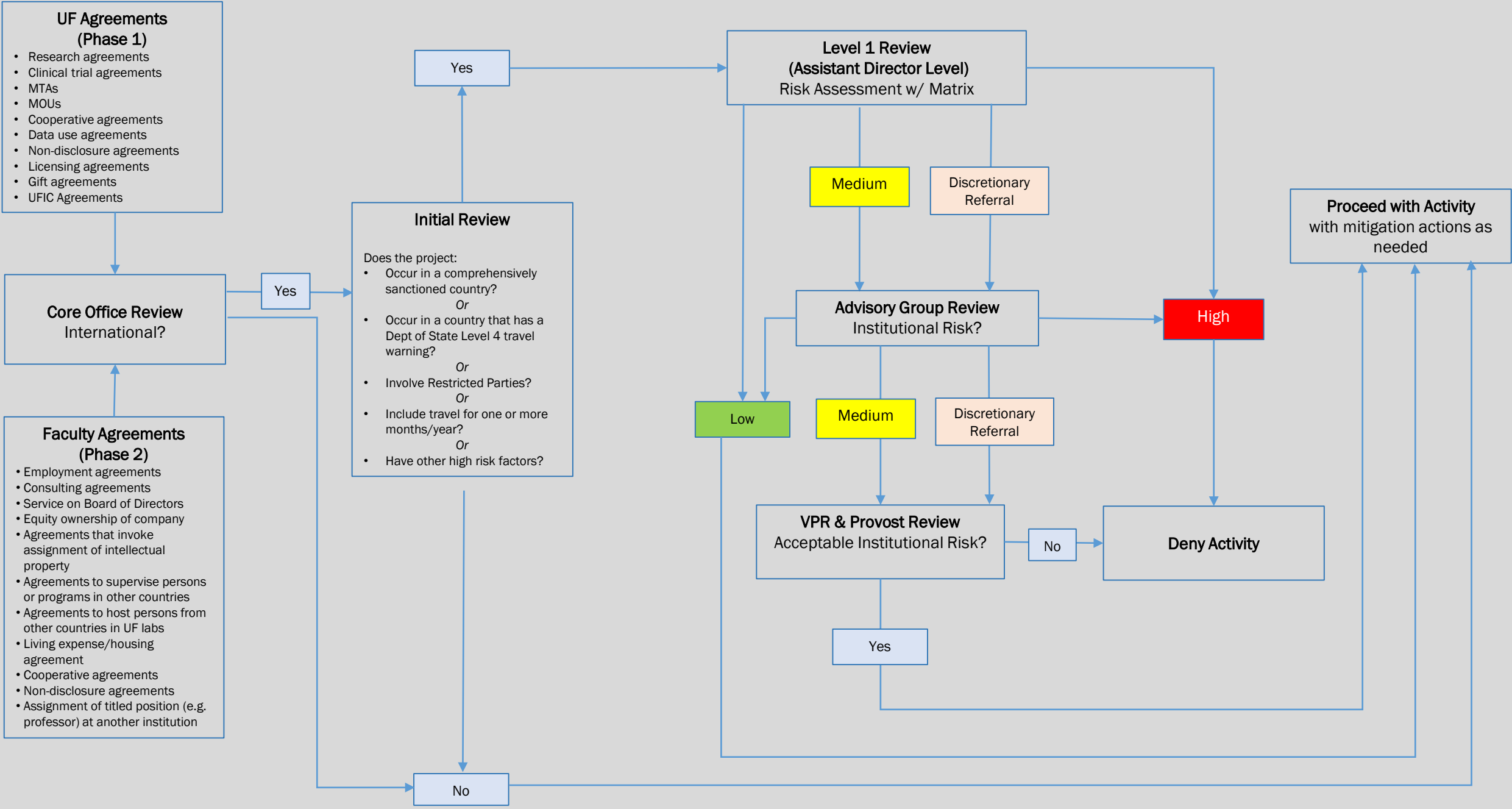
Proceed with Activity
with mitigation actions as needed

Yes

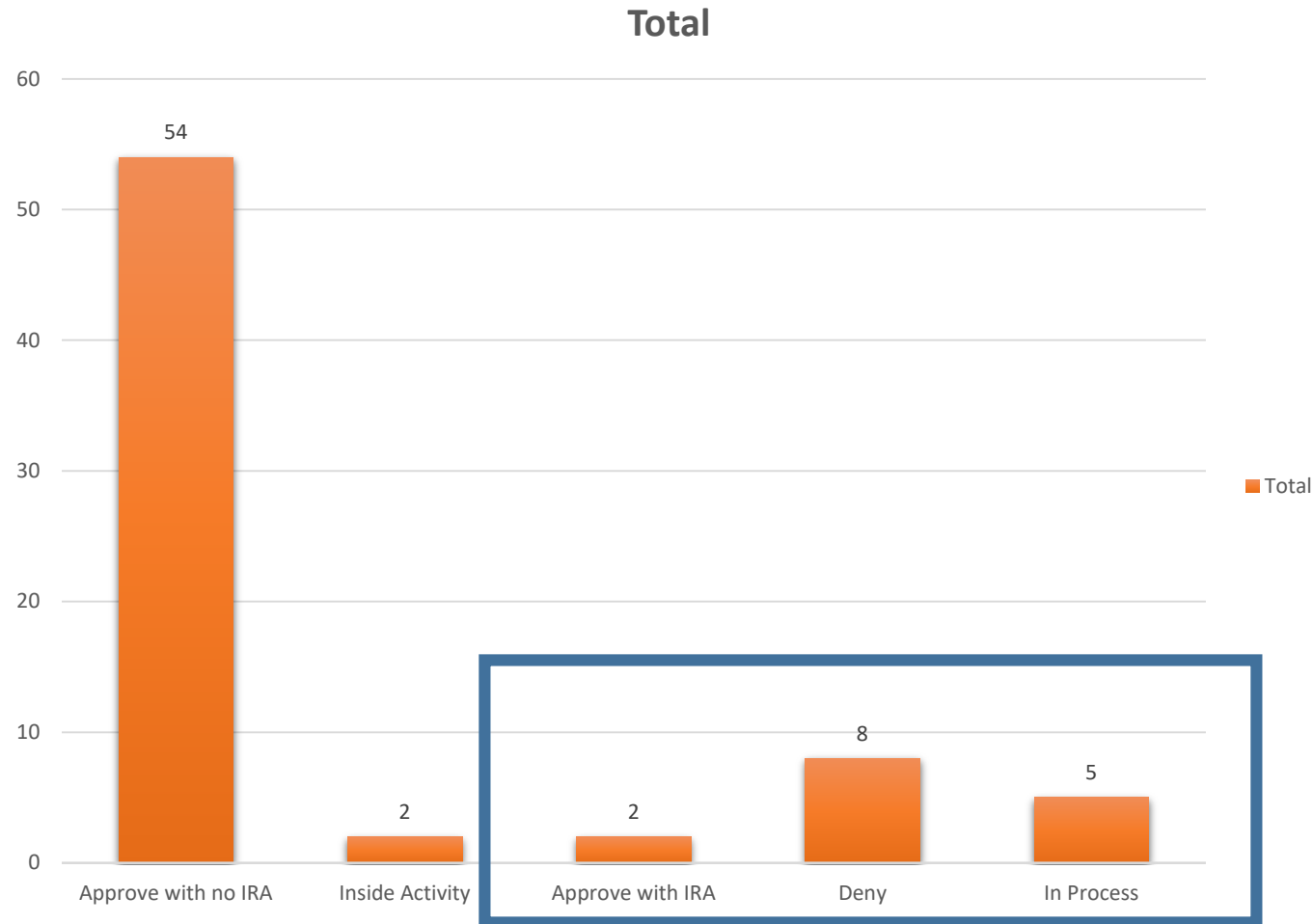
No

Yes

No



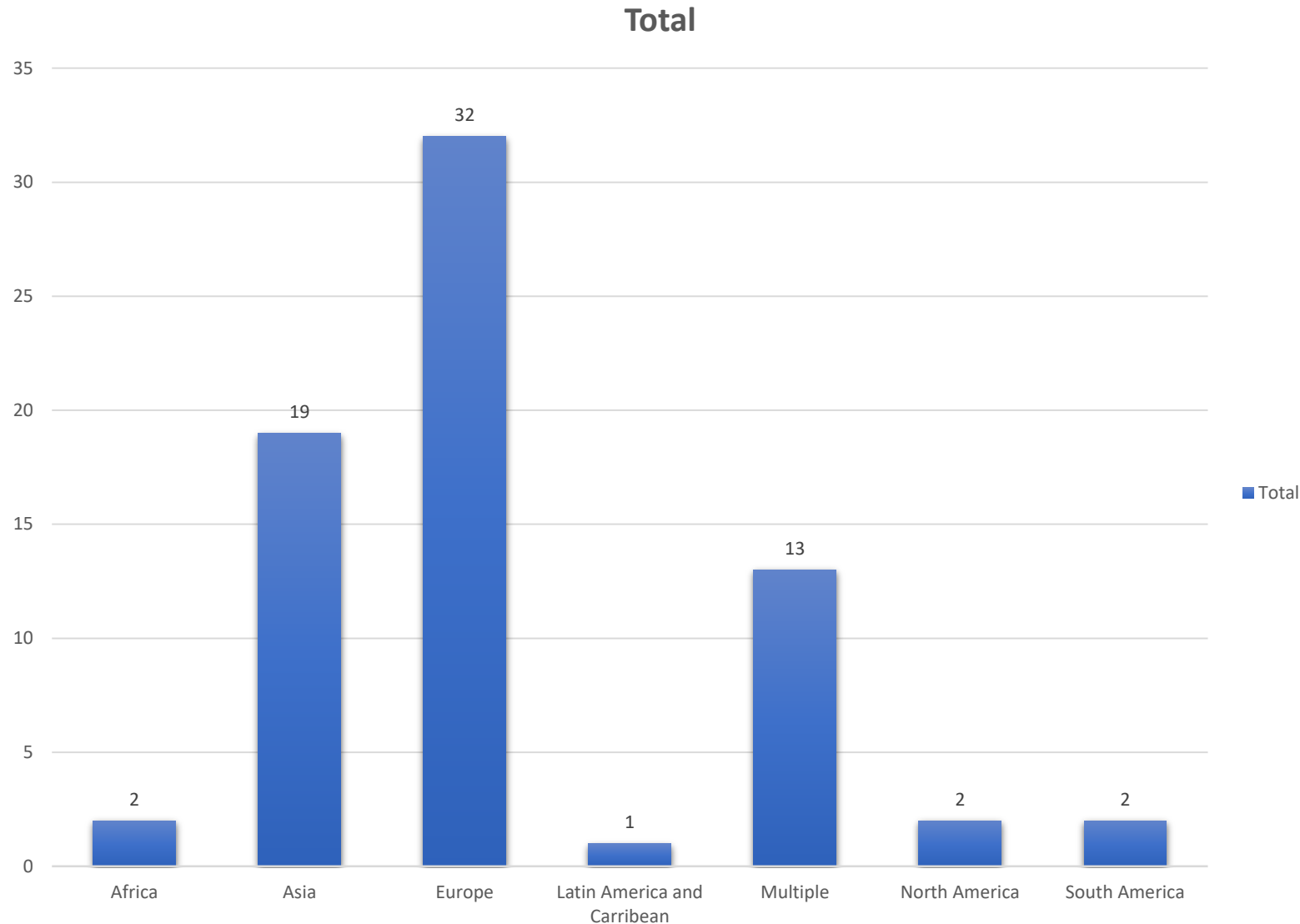
Metrics from UFOLIO Pilot



Of 71 reviews:

- 23 were escalated to AD level
- 15 were moved into the IRA process
- 8 denials; 6 due to non-responses
- 2 inside activities (should have gone through UFIRST)

Metrics from UFOLIO Pilot



Of 71 reviews:

- 13 multiples are publishing companies
- Vast majority of reviews from Europe, followed by Asia