



UNIVERSITY OF CALIFORNIA MERCED
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February 16, 2023

Dear Colleagues,

UC Merced is committed to global research and collaboration as it is fundamental to our core values and research mission. We are dedicated to academic freedom and an open, nondiscriminatory academic environment that embraces and promotes international collaboration.

Simultaneously, UC Merced is bound by federal requirements regarding foreign influence and is committed to transparent research compliance. We recognize and must address the U.S. Government concerns that some foreign entities and governments may attempt certain actions to gain advantages by inappropriately acquiring technical knowledge, information, and access to intellectual property. These activities compromise U.S. competitiveness and threaten our national and economic security. Federal funding agencies have made institutions of higher education keenly aware of their continuing expectations that grantees disclose all foreign financial conflicts of interest, other financial support, foreign components, conflicts of commitment, and other foreign affiliations.

UC Merced will continue to vigorously support our international research and collaborations, while also ensuring that we, as a research community, comply with all federal regulations, laws and UC policies, particularly with respect to disclosure requirements. Transparent and continuous compliance not only safeguards UC Merced, but also individual funding awards and recipients.

The Office of Research Compliance & Integrity (RCI) would like to take this opportunity to share new information and remind everyone of our responsibilities around [Export Controls](#) and [International Activities \(Foreign Engagement\)](#). In response to the foreign influence [systemwide audit](#) related to foreign influence risk in research, we have implemented a number of new processes, procedures and resources.

Ethics and Compliance Briefing for Researchers (ECBR): We have implemented the systemwide developed [ECBR](#). The ECBR course is intended for all University extramurally funded researchers, including faculty and staff researchers, as well as postdoctoral scholars. The course was developed to raise awareness of the UC Statement of Ethical Values and Standards of Ethical Conduct and to convey important information about conflict of interest (COI) regulations when accepting extramural research funds. This training replaces the previous version called "Compliance & Conflict of Interest for Researchers Briefing (COIR)" and satisfies two mandatory training requirements:

- Ethics and Compliance Briefing, required for all UC employees including faculty and staff.



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- [Public Health Service \(PHS\) Financial Conflict of Interest \(FCOI\) training](#), required of all researchers with grants from a federal funding agency that has adopted PHS FCOI requirements.

It also addresses federal funding agency research security concerns.

Research Security Video Series: We would like to again share the UC developed [Research Security Video Series](#) comprised of four short videos covering *Disclosures*, *Talent Recruitment Programs*, *International Collaborations* and *Data Security* available on the UCLC. This video series addresses a systemwide recommendation from the foreign influence audit, elements of [NSPM-33 implementation guidance](#) and is provided as a resource for our community.

Funding Agency Disclosure Information: Continued scrutiny of foreign influence on academic research by the federal government and federal sponsors remains constant. We would like to remind researchers of their obligations to disclose to federal sponsors all foreign activities. This includes any foreign support, research sites, components, and affiliations, both paid and unpaid, and honorary affiliations that would typically be listed on a PI biosketch. It is important that researchers be transparent when disclosing international activities. We developed a [resource page](#) that identifies what, when and where to disclose foreign activity.

Export Control Procedures and Guidance: In an effort to build a robust Export Control Compliance Program and to reconcile a number of systemwide audit recommendations, RCI has implemented several procedures, standard operating procedures (SOP) and guidance documents.

- [Export Control Procedure](#) - The procedure aims to meet the systemwide Export Control policy program requirements and outlines the roles and responsibilities for the campus community for activities that may trigger export control regulatory compliance.
- [Export Controls Compliance Manual](#) – Outlines UC Merced Export Control program
- [Restricted Party Screening SOP](#) – Procedures for conducting Restricted Party Screening and outlines roles and responsibilities
- [Export Control Red Flags SOP](#) – Procedures for identifying and escalating red flags and outlines roles and responsibilities
- [Export Control Red Flags Guidance](#) – Identifies and describes Export Control red flags

International Visitor Registration: In response to the foreign influence audit recommendation to vet international scholars, we have implemented a [pilot registration](#)



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[process](#) for international visitors. This process is for international visitors who are not sponsored for a visa by UC Merced and whose visit to UC Merced exceeds 10 consecutive days. International visitors who have an official academic appointment should not be registered via this new process.

International Activity: As a reminder, any interaction (payments, shipments, travel, etc.) to U.S. comprehensively sanctioned countries (Iran, Cuba, Syria, North Korea, Crimea), will require a license from the U.S. government prior to the activity. *This may include virtual interactions (e.g. giving a lecture virtually at an Iranian institution).* Likewise, research in a sanctioned, embargoed or other high risk countries (e.g. China, Russia, Belarus), interactions with restricted parties or collaborations involving [controlled items](#) or [activities](#) may also require a license. Please contact the [UC Merced Export Controls office](#) prior to participating in any of these activities/collaborations.

New Export Control Staff: Lastly, Chou Xiong, Research Compliance Analyst, is a new contact [for Export Control](#) and [Foreign Engagement](#) activity. Danielle Dai'Re-Benziger has stepped away from supporting Export Controls in her new role as Assistant Director for RCI.

RCI serves as a resource for all UC Merced personnel on issues of export controls and foreign engagement, so we encourage everyone to contact us with any questions or concerns that you may have about the above listed topics. We are committed to facilitating the research mission of our University and making sure it is carried out in compliance with all U.S laws and regulations.

Please contact exportcontrols@ucmerced.edu or foreignengagement@ucmerced.edu with any questions on the issues above or other related research compliance concerns.

Sincerely,

Gillian Wilson
Vice Chancellor for Research, Innovation and Economic Development

Leslie Teixeira-Porto
Assistant Vice Chancellor for Research Compliance and Integrity