
International Engagement: Research Security and Disclosure Requirements Town Hall

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INTERNATIONAL ENGAGEMENT IS OF FUNDAMENTAL IMPORTANCE TO UCLA

PURPOSE OF BRIEFING

- SAFEGUARDING RESEARCH OVERVIEW
- FEDERAL SPONSOR REQUIREMENTS
- DISCLOSURE REQUIREMENTS

SAFEGUARDING RESEARCH | AN OVERVIEW



INTERNATIONAL
COLLABORATIONS



EXPORT CONTROLS
& SANCTIONS



CYBERSECURITY



TRAVEL SECURITY



FEDERAL SPONSOR
REQUIREMENTS



DISCLOSURE
REQUIREMENTS

UCLA Supports International Collaborations

SHARING RESEARCH MATERIALS WITH THIRD PARTIES

- Protect IP – Contact UCLA TDG
- Data Use Agreement (DUA)
- Material Transfer Agreement (MTA)

RESTRICTED PARTY SCREENING

- Ensure compliance with U.S. export controls and sanctions
- Do not engage with restricted parties

COUNTRIES OF CONCERN

- China, Iran, North Korea, Russia, Qatar, Saudi Arabia, and United Arab Emirates
- Institutional level engagements require enhanced review prior to acceptance

INTERNATIONAL VISITORS & VISITING SCHOLARS

- Visitors – no access to controlled/sensitive technology or data
- Visiting scholars – approved under an Academic Personnel visitor series

FOREIGN TALENT RECRUITMENT PROGRAMS

- Participation must be disclosed to UCLA
- Malign foreign talent recruitment program participation is prohibited

SAFEGUARDING RESEARCH | EXPORT CONTROLS



WHAT ARE EXPORT CONTROLS?

The **federal laws and regulations** that have been established by the U.S. government to control:

- The export of sensitive equipment, software, and technology
- Trade and financial transactions

Controls promote U.S. national security interests, foreign policy objectives, and the economy

Non-compliance may result in fines, reputational damage, and jeopardized federal funding

IMPORTANT NOTES

EXPORT the shipment, transmission, or transfer of items, information, and software to foreign countries, persons, or entities

UC's PRINCIPAL STRATEGY FOR COMPLIANCE*

- Fundamental Research
- Results of research are not subject to export control restrictions
- Freedom to publish and disseminate research results



DO NOT PROCEED - CONTACT EXPORT CONTROL!

 Cuba

 Iran

 North Korea

 Syria

 Ukraine*

**certain regions*

Restrictions on ALL activities:

- Imports/exports – including hand-carry items, digital transfer of data or technology
- Financial transactions – incoming, outgoing
- Services (e.g., SFSA, business contract, medical)
- Business travel (including remote work)

Examples:

- Teaching
- Research
- Conferences
- Procurement – goods and services
- Remote Work

License most likely required!

SAFEGUARDING RESEARCH | CYBER & TRAVEL SECURITY



CYBERSECURITY

UCLA
Digital &
Technology
Solutions (DTS)



TRAVEL SECURITY

UCLA Export
Controls

Insurance & Risk
Management
(IRM)

UCLA DTS

NATIONAL SECURITY POLICY MEMORANDUM (NSPM 33)

What is Research Security?

Safeguarding the research enterprise against the misappropriation of research and development to the detriment of national or economic security, related violations of research integrity, and foreign government interference.



NSPM 33 TIMELINE

- Issued by the White House January 14, 2021
- Directed federal agencies to develop policies on:
 - Disclosure requirements
 - Research security programs
 - Use of digital persistent identifiers (DPIs)
 - Consequences for non-compliance
 - Information sharing among agencies

NSPM 33
Presidential
Memorandum



- Issued by National Science & Technology Council, January 2022
- Focused on:
 - Standardizing disclosure forms (bio-sketch, current & pending support)
 - Outlining expectations for research security programs

NSMP 33
Implementation
Guidance



- Issued by OSTP July 2024
- Institutions receiving >\$50M/year must establish and certify a Research Security Program including:
 - Cybersecurity
 - Foreign travel security
 - Research security training
 - Export control training

Guidelines for
Research Security
Programs



CURRENT LANDSCAPE

THE SELECT COMMITTEE ON THE
STRATEGIC COMPETITION BETWEEN
THE UNITED STATES AND
THE CHINESE COMMUNIST PARTY

FOX IN THE HENHOUSE:

THE U.S. DEPARTMENT OF DEFENSE
RESEARCH AND ENGINEERING'S
FAILURES TO PROTECT TAXPAYER-
FUNDED DEFENSE RESEARCH



The investigations revealed how the Chinese Communist Party (CCP) exploits U.S. universities—and gains access to U.S. government-funded research—to fuel its military and technological rise

... involved research in sensitive technical domains such as hypersonics, quantum sensing, semiconductors, artificial intelligence (AI), advanced materials, cyber warfare, intelligence, surveillance, and reconnaissance (ISR) systems, and next-generation propulsion—many with clear military applications.

Issued September 4, 2025

CURRENT LANDSCAPE



Congress of the United States
House of Representatives

SELECT COMMITTEE ON THE CHINESE COMMUNIST PARTY

March 18, 2025

[Letters](#) sent to Carnegie Mellon, Purdue University, Stanford University, the University of Illinois, the University of Maryland, and the University of Southern California

... the pursuit of short-term financial gains by academic institutions jeopardizes long-term global technological leadership and national security.

Our nation's universities... are increasingly used as conduits for foreign adversaries to illegally gain access to critical research and advanced technology.

... too many U.S. universities... [are] admitting large numbers of Chinese nationals into advanced STEM programs, potentially at the expense of qualified Americans.

Accordingly, we write to request information regarding your university's policies and oversight mechanisms concerning the enrollment of Chinese national undergraduate, graduate, and PhD students, their involvement in federally funded research, and the security of sensitive technologies developed on campus.

FEDERAL RESEARCH FUNDING CONSIDERATIONS



DISCLOSURES



**MANDATORY TRAINING FOR
SENIOR KEY PERSONNEL**



NEW CERTIFICATIONS



SPONSOR RISK ASSESSMENTS



RISK MITIGATION PLANS

DISCLOSURES: BIO-SKETCHES AND CURRENT & PENDING (OTHER) SUPPORT

Federal agencies use disclosure reports to help identify potential:

- Conflicts of commitment
- Conflicts of interest
- Budgetary overlap
- Scientific overlap

And, in conjunction with other open-source data, to:

- Assess if the disclosures are accurate
- Flag associations, funding or collaborations that might increase the research security risk

BIO-SKETCH

Include all domestic and foreign appointments/affiliations/employment including:



- ✓ Full-time, part-time, voluntary, adjunct, visiting, honorary, “guest”
- ✓ Leadership/management/fiduciary roles (e.g., CEO, President, Director) or Board of Directors
- ✓ Paid or Unpaid
- ✓ Appointments/Affiliations likely to be cited in publications
- ✓ Participation in non-US government talent recruitment programs

CURRENT & PENDING (OTHER) SUPPORT

Include all resources available to you in support of and/or related to your research endeavors, regardless of whether they have monetary value, including:



Resources and/or financial support from all foreign and domestic entities made available to you, including any not received through **UCLA** (Remember: VCR approval is required to apply for and receive research funding outside of UCLA, [UCLA Policy 909](#))



Consulting/advising/professional services that include the design, conduct, or reporting of research



Startup funds from an outside entity

CURRENT & PENDING (OTHER) SUPPORT

IN-KIND CONTRIBUTIONS

People, resources, supplies, equipment provided for use in your research by outside sources such as domestic or foreign universities, governments or for-profit entities, or other external collaborators/colleagues. Examples of In-Kind contributions include:



Fellowship funded students and post docs, visiting students, post docs, and scholars paid by an external entity or source



Molecules, biologics, chemicals, vectors, data, libraries, model systems such as transgenic mice, cell lines, cloud storage space, equipment loans



Non-UCLA office/laboratory space made available for your research endeavors



Travel that is supported/paid by an entity other than UCLA to perform research activities with an associated time commitment

CURRENT & PENDING (OTHER) SUPPORT

DISCLOSING GIFTS AND DONATIONS

General philanthropic gifts and donations do not need to be included in Current and Pending (Other) Support if they are unconditional gifts and **are not linked to specific research or personnel**. However, funding provided to a specific researcher, that involves a time commitment and is placed in a separate account for a PI to use on the specified research is reportable as Current and Pending (Other) Support.

EXAMPLES OF DONATIONS THAT ARE REPORTABLE IN CURRENT & PENDING (OTHER) SUPPORT DISCLOSURES

An individual donates \$500,000 to an “HIV Research Fund” at UCLA. The department puts money from that research fund into an account used by a PI to fund research in that specific area

When a philanthropist who had Parkinson's disease dies and their estate donates \$5 million to a UCLA investigator who is a leading Parkinson's researcher. The donation is accompanied by a letter, expressing that the money is to support the investigator's “esteemed and important work.” The investigator uses the money to fund their research

UCLA receives \$100,000 through a foreign private charitable foundation that supports research on childhood cancers. The department puts some of this donated money into an account used by an investigator to fund research on treatments for childhood leukemia

CERTIFICATIONS

BIO-SKETCH

*I certify that the information provided is **current, accurate, and complete.***

*This includes but is not limited to **information related to domestic and foreign appointments and positions.***

I also certify that, at the time of submission, I am not a party to a [malign foreign talent recruitment program](#).

Misrepresentations and/or omissions may be subject to prosecution and liability pursuant to, but not limited to, 18U.S.C. §§ 287, 1001, 1031 and 31 U.S.C. §§ 3729-3733 and 3802.

Signature:

CURRENT & PENDING (OTHER) SUPPORT

*I certify that the information provided is **current, accurate, and complete.***

*This includes, but is not limited to, **information related to current, pending, and other support (both foreign and domestic)** as defined in 42 U.S.C. §6605.*

I also certify that, at the time of submission, I am not a party in a [malign foreign talent recruitment program](#).

Misrepresentations and/or omissions may be subject to prosecution and liability pursuant to, but not limited to 18 U.S.C. §§ 287, 1001, 1031 and 31 U.S.C. §§ 3729-3733 and 3802.

Signature:

RECENT FINDINGS & DOJ SETTLEMENTS

Audits, studies, investigations included HHS Office of Inspector General (OIG), NSF OIG, Department of Justice, NIH Office of Extramural Research. Grants from NIH, NSF, Army, Navy, Air Force & NASA

Failure, or alleged failure to disclose:

- Affiliations
- In-kind contributions
- Participation in foreign talent programs
- Foreign components
- Research support including foreign grants and gifts
- Employment at a foreign institution

Federal responses included:

- Adding mandatory training and PI and institutional certifications
- Settlements
- Requiring executive-level certifications to the accuracy of NIH submissions
- Withdrawing institutional authority for first time NCEs
- Removing all NIH awards from the Streamlined Non-Competing Award Process (“SNAP”)
- Employment termination or resignation of researchers
- Removal from peer review activities
- Removal from grant-related responsibilities

UPDATES TO PREVIOUSLY SUBMITTED DISCLOSURES?

- ❑ Contact OtherSupportHelp@research.ucla.edu if you think you may need to update your Bio-sketch, Current & Pending or Other Support Disclosures
- ❑ We will work with you to review and determine if an updated disclosure to the sponsor is required
- ❑ If UCLA becomes aware of an omission after a disclosure is submitted, we are required to immediately report it to the sponsor

NIH SPECIFIC REQUIREMENTS



OTHER SUPPORT TRAINING

Everyone identified as senior/key personnel must complete Other Support Training.

[Research Security at the University of California \(Job Aid\)](#)



ENGLISH TRANSLATION OF NON-UCLA CONTRACTS/AGREEMENTS

Copies of contracts/agreements specific to senior/key-personnel foreign appointments and/or employment with a foreign institution for all foreign activities and resources that are reported in Other Support



INTERNATIONAL SUBAWARDS WILL NO LONGER BE PERMITTED

NIH will contract directly with international collaborators



PRIOR APPROVAL FOR FOREIGN COMPONENT

Indicators include:

- Co-authorship
- Use of facilities or Instrumentation
- Financial support
- Use of animal or human subjects
- Expansive foreign travel on a project

FOREIGN TALENT RECRUITMENT PROGRAMS

Announcements

Malign Foreign Talent Recruitment Programs

View the full announcement [here](#)

Posted On August 25, 2025

Dear Colleagues:

UCLA faculty are regularly recognized as distinguished researchers attracting global attention. Foreign talent recruitment programs are mechanisms sometimes used by foreign countries to legitimately recruit U.S. researchers. These programs may include positions or activities with compensation (cash or in-kind), research funding, complimentary travel, honorific titles, and promises of career advancement. Of recent concern, however, has been the proliferation of Malign Foreign Talent Recruitment Programs (MFTRPs), which encourage, or even require, unethical or criminal behavior, and/or contain requirements that may pose a conflict of interest, conflict of commitment, or loss of intellectual property to their U.S. home institution and federal research awards.

Guidance

Definitions of foreign talent recruitment programs and MFTRP can be found at [OSTP's Guidelines](#) for Federal Research Agencies Regarding Foreign Talent Recruitment Programs as well as on the [UCOP Foreign Talent Recruitment Programs](#) web page, which includes a short video on this topic.

A Malign Foreign Talent Recruitment Program (MFTRP) is a program that is sponsored by a Foreign Country of Concern (FCOC) or an entity based on a FCOC, currently defined as:

- China
- North Korea
- Russia
- Iran

[UC Academic Personnel Memo APM- 025](#) and [APM-671](#) require prior approval for current or pending participation in non-US government talent recruitment programs

Participation in MFTRP is prohibited under the Federal Chips & Science Act

INDICATORS OF A NON-US FOREIGN TALENT PROGRAM



WRITTEN OR VERBAL AGREEMENT

Such as an employment agreement or memorandum of understanding



TYPICALLY INCLUDES A NON-US UNIVERSITY AND A UC RESEARCHER

Does not always include the UC researcher's institution



COMPLIANCE WITH FOREIGN LAW

Requirement that the researcher comply with the laws of the non-U.S. nation



PROMISED COMPENSATION

Might include cash or in-kind compensation, research support, complimentary travel, and honorific titles



SUPPORT FROM NON-US SOURCES

Might be from a non-U.S. government national or include a private entity



CONFLICT OF INTEREST/ COMMITMENT

Requirement that the researcher commit effort/time in the talent program resulting in conflict of commitment or interest

TYPICAL PARTICIPATION REQUIREMENTS

Publication of high-level articles in important international academic journals, in the name of non-U.S. institutions

Introduction and cultivation of non-U.S. nation's domestic scholars or graduate students, including assistance in publications, inclusion in exchanges and sponsorship or recruitment of such scholars or students to work or study at UC

Inclusion of the name of the UC researcher and primary affiliation with the non-U.S. institution in any publications, award applications, patent applications and research project applications.

RESEARCH SECURITY TRAINING

Announcements

On behalf of AVC Marcia Smith: Review of Federal Training Requirements for PIs and Senior Key Personnel – “Research Security” and “Disclosure of Other Support”

View the full announcement [here](#)

Posted On October 8, 2025

To: Researchers on Federally-Funded Projects

In accordance with provisions of the CHIPS and Science Act, federal agencies are implementing research security training requirements for Grantee Institutions and Senior Key Personnel (SKP) on federally-funded awards. Below is a summary of current and upcoming training requirements by agency.

If you have questions about the NIH Other Support Training requirement, please contact Marcia Smith at marcia.smith@research.ucla.edu.

If you have questions about Research Security Training, please contact UCLA Research Security at Research.Security@research.ucla.edu.

- Currently required before proposal submission by NSF and DOE
- Will be required by other agencies in the coming months

- UCOP-developed Research Security Training (approx. 40 minutes) is available via CITI. Use this [Job Aid](#) to access the training, or
- [NSF Consolidated Research Security Training Module](#) (approx. 1 hour) is available on the [NSF SECURE Center site](#).

RESEARCH SECURITY TRAINING: TOPICS COVERED



CYBERSECURITY



INTERNATIONAL
COLLABORATION



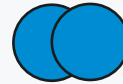
FOREIGN INTERFERENCE



PROPER USE OF FUNDS

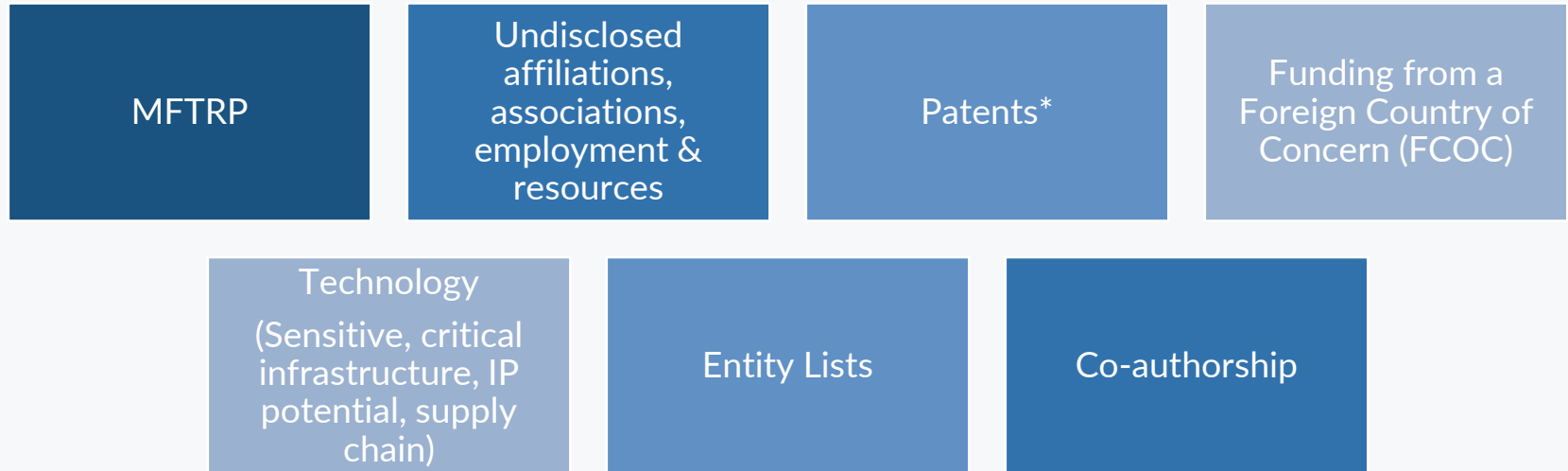


DISCLOSURE
REQUIREMENTS



CONFLICTS OF
COMMITMENT &
CONFLICTS OF INTEREST

RESEARCH SECURITY RISK ASSESSMENTS (DOD MATRIX EXAMPLE)



**Patents arising from US-funded research filed in a foreign country before being filed in the U.S. can be an indicator of undisclosed agreements with a foreign country*

RESEARCH MITIGATION PLANS (EXAMPLES)

Increased frequency of reporting by the covered individuals through RPPRs

Providing to the federal agency external (non-UCLA) contracts and arrangements for review

Resignation from positions deemed problematic by the risk-based security review

Replacement of individuals who are deemed by the agency to be a research security risk

Identification and prior approval for non-US citizens working on the project

Certification there will be no collaboration with anyone on the Entity Lists

Advance sponsor notification of all for international travel, including personal travel

Immediate reporting of any inquiries about the funded research from foreign operatives

CO-AUTHORSHIP

Co-authorship may be used in risk assessments as a potential indicator of: Collaborations with entities and individuals from FCOC; undisclosed funding; association with denied parties; MFTRPs; and (for NIH) an indicator of an undisclosed foreign component on NIH funded projects



- Use formal authorship contribution statements to specify each authors role and to help distinguish US based work from future foreign affiliations
- Request prior students to list UCLA affiliation for work performed entirely at UCLA
- Clarify funding in the acknowledgements (i.e., who supported your funding for the efforts in the publication)
- Actively monitor for publications where you are listed as a co-author

Thank You

Q & A