| **CAMPUS: UCLA** |
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| **Recommendation** | **Management Corrective Action** | **Target Date** |
| **Protocols to Detect Undisclosed Faculty Affiliations** |
| 1. Evaluate the recommended baseline institutional protocols and modify them as necessary vis-à-vis their own infrastructure, resources, and communication and IT systems to implement them locally. For example, templates developed by the working group could be tailored to meet local needs.
 | 1. Research & Creative Activities will evaluate baseline protocols developed through systemwide collaboration of key stakeholders and modify them as necessary.
2. Research & Creative Activities will implement protocols developed in 1.2(A).
 | April 1, 2022 |
| **Conflict of Interest** |
| * 1. Implement protocols at the campuses, health systems, and LBNL to ensure that the compliance function (CECO and HCCO) regularly receives information (such as copies of determination letters sent to PIs after identification of significant financial interests in foreign entities) and is engaged, as appropriate for each location, on significant conflict of interest issues and management plans. An example of engagement by the compliance officer could be ex-officio membership on a financial conflict of interest committee.
 | 1. Research & Creative Activities will consider recommendations made by UCLA Health Compliance and Campus Compliance to determine how best to share information about reviews conducted by the campus Conflict of Interest Review Committee (CIRC).
2. Evaluate eDGE functionality to identify organizations as US or foreign entities.
3. Research Policy & Compliance, will implement processes developed in 2.1(A) and B.
 | January 1, 2022 |
| **Conflict of Commitment** |
| 1. Evaluate the protocols and measures developed to help ensure complete and timely submission and review of outside activity disclosures vis-à-vis their own infrastructure resources, and communication and IT systems to implement these or other measures to achieve the same goal.
 | 1. Academic Personnel Office and Research & Creative Activities will evaluate protocols developed through systemwide collaboration to determine the feasibility of local implementation, modifying them as necessary.
2. Academic Personnel Office and Research & Creative Activities will implement protocols developed in 3.6(A).
 | April 1, 2022 |
| * 1. Evaluate the best practice solutions for institutional office compliance monitoring recommended by the OATS Governance Board and modify them as necessary to implement them locally.
 | 1. Academic Personnel Office will evaluate best practice solutions for compliance monitoring by OATS Governance Board and modify local procedures as necessary.
2. Academic Personnel Office will implement procedures developed in 3.7(A).
 | April 1, 2022 |
| **Training and Awareness** |
| * 1. Implement the system-developed “Ethics and Compliance Briefing for Researchers” training module and require, at a minimum, all researchers receiving research funding complete the training biennially. Consider expanding the training audience to graduate students, visiting scholars, and grant key personnel.
 | 1. Campus Compliance will form a workgroup of relevant stakeholders to review the system-developed “Ethics and Compliance Briefing for Researchers” training module and consider expanding training audience outside of the required population.
2. Campus Compliance will implement training to appropriate audience as determined in 4.6(A)
 | April 1, 2022 |
| * 1. Address consequences for non-compliance with the completion requirement for the mandatory systemwide training.
 | The training module implementation plan will address consequences for non-compliance. | April 1, 2022 |
| * 1. Implement a local foreign influence risk communication plan, taking into consideration the systemwide guidance
 | 1. Following completion of the systemwide guidance of a foreign influence risk communication plan, Campus Compliance and Research & Creative Activities will evaluate the systemwide guidance, modify local plans as needed, and confer with others as appropriate.
2. Research & Creative Activities will implement foreign influence risk communication plan developed in 4.8(A).
 | July 1, 2022 |
| **Restricted Party Screening** |
| * 1. Create and implement export control procedures as outlined in the UC export control policy. At a minimum, these procedures should include:
	+ Defined roles and responsibilities for restricted party screening as outlined in the export control policy
	+ Escalation procedures for positive screenings
	+ Periodic ECO monitoring to ensure that the responsible parties are performing these procedures.
 | UCLA will create and implement export control procedures in compliance with the UC export control policy. In addition, these procedures will include the following:* + Defined roles and responsibilities for restricted party screening;
	+ Escalation procedures for positive screenings;
	+ Periodic ECO monitoring to ensure that the responsible parties are performing these procedures.
 | October 1, 2022 |
| * 1. Implement the system-developed training module to educate faculty and staff on the importance and requirements of restricted party screening
 | Following the completion of a training module developed by ECAS and RPAC, with consultation from systemwide and campus export control officers, Research Policy & Compliance will evaluate module to determine the appropriate audience to complete training and assign training to those individuals. | October 1, 2022 |
| **Export Control Red Flags** |
| 1. Implement written procedures to address red flags in accordance with systemwide guidance, including escalation procedures that are specific to the location.
 | Research Policy & Compliance, with input from Office of Research Administration, will evaluate existing written procedures that address red flags following the completion of systemwide guidance developed by ECAS and RPAC. Research Policy & Compliance will make modifications to written procedures as appropriate in coordination with Office of Research Administration. | October 1, 2022 |
| * 1. Develop localized training on the red flags procedures leveraging the systemwide training content and implement the training for appropriate personnel.
 | Research Policy & Compliance will evaluate systemwide export controls red flags training content and modify and implement localized training as appropriate. | October 1, 2022 |
| **Vetting of International Scholars** |
| * 1. Implement the systemwide guidance*,* vis-à-vis the location’s infrastructure, resource, communication and IT systems, etc., in the form of local procedures, which should include escalation procedures that are specific to the location.
 | Following developed guidance from ECAS and RPAC, Research Policy & Compliance will evaluate guidance on vetting international scholars and modify local procedures as appropriate. | October 1, 2022 |
| **Research Data Protections** |
| * 1. Implement guidelines for compliance with UC Research Data and Tangible Research Materials policy. At a minimum, these guidelines should establish responsibility for tracking compliance with sponsor research data protection requirements.
 | Following the completion of the UC Research Data and Tangible Research Materials Policy, Research Policy & Compliance will evaluate the policy to implement local guidelines as appropriate. | October 1, 2022 |
| **Oversight of Foreign Gifts and Contracts Reporting** |
| * 1. Convene a working group or committee to oversee Section 117 reporting that consists of representatives from all reporting departments. The working group should identify a central office with the appropriate knowledge of the U.S. Department of Education requirements to review each Section 117 report prior to submission.
 | UCLA has created a working group in response to Section 117 reporting. Campus Compliance has been identified as the central office to review Section 117 reports prior to submission. | January 1, 2022 |
| * 1. Establish protocols to ensure individuals responsible for making determinations on selling membership agreements are not also receiving the benefit from associated fees.
 | Campus Compliance will evaluate membership agreements on campus to confirm protocols are established to ensure individuals responsible for making determinations on selling membership agreements are not receiving the benefit from associated fees. | January 1, 2022 |

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