

Foreign Influence Audit Local Report – Management Corrective Actions

CAMPUS: UCD		
Recommendations	Management Corrective Actions	Target Date
1. Protocols to Detect Undisclosed Faculty Affiliations		
1.2 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.	A. Office of Research Compliance and Integrity will evaluate baseline protocols developed to minimize the risk of inaccurate or incomplete information related to foreign research support, foreign talent programs, and affiliations of key personnel in contract and grant proposals. Office of Research Compliance and Integrity will modify these protocols as necessary based on local infrastructure, resources, and communication and IT systems.	12/1/2021
	B. After obtaining approval from Ethics, Compliance and Audit Services at the Office of the President, Office of Research Compliance and Integrity will implement protocols developed to minimize the risk of inaccurate or incomplete information related to foreign research support, foreign talent programs, and affiliations of key personnel in contract and grant proposals.	1/1/2022
	C. Academic Affairs will evaluate baseline protocols developed to minimize the risk of inaccurate or incomplete information related to foreign research support, foreign talent programs, and affiliations of key personnel in contract and grant proposals. Academic Affairs will modify these protocols as necessary based on local infrastructure, resources, and communication and IT systems.	2/1/22
	D. After obtaining approval from Ethics, Compliance Audit Services at the Office of the President, Academic Affairs will implement protocols developed to minimize the risk of inaccurate or incomplete information related to foreign research support, foreign talent programs, and affiliations of key personnel in contract and grant proposals.	3/1/22

Foreign Influence Audit Local Report – Management Corrective Actions

CAMPUS: UCD		
Recommendations	Management Corrective Actions	Target Date
2. Conflict of Interest		
2.1 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.	A. Office of Research Compliance and Integrity will implement protocols 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 UC Davis, on significant conflict of interest issues and management plans.	12/1/2021
3. Conflict of Commitment		
3.6 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.	A. Academic Affairs will evaluate baseline protocols and measures developed to ensure complete and timely submission and review of outside activity disclosures. Academic Affairs will modify these protocols and measures as necessary based on local infrastructure resources, and communication and IT systems.	2/1/22
	B. After obtaining approval from Ethics, Compliance and Audit Services at the Office of the President, Academic Affairs will implement protocols and measures developed to ensure complete and timely submission and review of outside activity disclosures.	3/1/22
3.7 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.	A. Academic Affairs will evaluate the best practice solutions for institutional office compliance monitoring recommended by the OATS Governance Board and modify them as necessary.	2/1/22
	B. After obtaining approval from Ethics, Compliance and Audit Services at the Office of the President, Academic Affairs will implement modified best practice solutions for institutional office compliance monitoring recommended by the OATS Governance Board.	3/1/22

Foreign Influence Audit Local Report – Management Corrective Actions

CAMPUS: UCD		
Recommendations	Management Corrective Actions	Target Date
4. Training and Awareness		
4.6 Implement the system-developed “Ethics and Compliance Briefing for Researchers” training module and require, at a minimum, all researchers receiving research funding to complete the training biennially. Consider expanding the training audience to graduate students, visiting scholars, and grant key personnel.	A. Office of Compliance and Policy will implement the system-developed “Ethics and Compliance Briefing for Researchers” training module and require all researchers receiving funding to complete the training biennially. Office of Compliance and Policy must also consider expanding the training audience to graduate students, visiting scholars, and grant key personnel.	1/1/2022
4.7 Address consequences for non-compliance with the completion requirement for the mandatory systemwide training.	A. Academic Affairs will address consequences for non-compliance with the completion requirement for the mandatory systemwide training.	12/1/21
4.8 Implement a local foreign influence risk communication plan, taking into consideration the systemwide guidance.	A. Academic Affairs will implement a local foreign influence risk communication plan, taking into consideration the systemwide guidance.	1/1/2022
5. Restricted Party Screening		
5.3 Create and implement export control procedures as outlined in the UC export control policy. At a minimum, these procedures should include: <ul style="list-style-type: none"> • Defined roles and responsibilities for restricted party screening as outlined in the export control policy; • Escalation procedures for positive screenings; and • Periodic ECO monitoring to ensure that the responsible parties are performing these procedures. 	A. Office of Research Compliance and Integrity will create and implement export control procedures as outlined in the UC export control policy. At a minimum, these procedures should include: <ul style="list-style-type: none"> • Defined roles and responsibilities for restricted party screening as outlined in the export control policy; • Escalation procedures for positive screenings; and • Periodic Export Control Officer (ECO) monitoring to ensure that the responsible parties are performing these procedures. 	7/1/2022
5.4 Implement the system-developed training module to educate faculty and staff on the importance and requirements of restricted party screening.	A. Office of Research Compliance and Integrity will implement the system-developed training module to educate faculty and staff on the importance and requirements of restricted party screening.	7/1/2022

Foreign Influence Audit Local Report – Management Corrective Actions

CAMPUS: UCD		
Recommendations	Management Corrective Actions	Target Date
6. Export Control Red Flags		
6.2 Implement written procedures to address red flags in accordance with systemwide guidance, including escalation procedures that are specific to the location.	A. After obtaining approval from Ethics, Compliance and Audit Services at the Office of the President, Office of Research Compliance and Integrity will implement written procedures to address red flags in accordance with systemwide guidance, including escalation procedures that are specific to UC Davis.	7/1/2022
6.3 Develop localized training on the red flags procedures leveraging the systemwide training content and implement the training for appropriate personnel.	A. Office of Research Compliance and Integrity will develop localized training on the red flags procedures leveraging the systemwide training content.	7/1/2022
	B. Office of Research Compliance and Integrity will implement the training for appropriate personnel.	8/1/2022
7. Vetting of International Scholars		
7.2 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.	A. After obtaining approval from Ethics, Compliance and Audit Services at the Office of the President, Office of Research Compliance and Integrity will implement the systemwide guidance, vis-à-vis UC Davis' infrastructure, resource, communication and IT systems, etc., in the form of local procedures, which should include escalation procedures that are specific to UC Davis.	7/1/2022
8. Research Data Protections		
8.2 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.	A. After obtaining approval from Ethics, Compliance and Audit Services at the Office of the President, Office of Research Compliance and Integrity will implement guidelines for compliance with UC Research Data and Tangible Research Materials policy. At a minimum, these guidelines will establish responsibility for tracking compliance with sponsor research data protection requirements.	9/1/2022

Foreign Influence Audit Local Report – Management Corrective Actions

CAMPUS: UCD		
Recommendations	Management Corrective Actions	Target Date
9. Oversight of Foreign Gifts and Contracts Reporting		
9.2 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.	A. Office of Compliance and Policy will convene a working group to oversee Section 117 reporting that consists of representatives from all reporting departments.	12/1/2021
	B. Office of Compliance and Policy will document the working group’s identification of a central office with the appropriate knowledge of the U.S. Department of Education requirements to review each Section 117 report prior to submission.	12/1/2021
9.3 Establish protocols to ensure individuals responsible for making determinations on selling membership agreements are not also receiving the benefit from associated fees.	A. Office of Compliance and Policy will document the working group’s protocols to ensure individuals responsible for making determinations on selling membership agreements are not also receiving the benefit from associated fees.	12/1/2021