

Research

Research Security and International Engagements

Disclosure, Review, and Approval of Engagements Involving Countries of Concern

Responsible Administrator: Vice Chancellor for Research

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Effective: July 1, 2025

References/Resources:

- Federal Law, Regulations and Resources
 - [National Security Presidential Memorandum 33 \(NSPM 33\)](#)
 - [Guidance for Implementing NSPM 33](#)
 - [CHIPS and Science Act of 2022 \(42 U.S. Code subsection 19221\)](#)
 - [Section 117 of the U.S. Higher Education Act of 1965](#)
 - [Institutional Compliance with Section 117 of the Higher Education Act of 1965](#)
- UC Policies
 - [President Drake's August 28, 2023, letter to Chancellors establishing a framework for UC international affiliations and agreements involving emerging technology and countries of concern](#)
 - [UC International Engagement Enhanced Review and Approval Guidance](#)
 - [International Activities](#)
 - [Export Control Policy](#)
 - [Standards of Ethical Conduct](#)
- UCI Resources
 - [Research Security & International Engagements](#)
 - [Countries of Concern Engagements](#)
 - [Research Security Program](#)
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 - [Frequently Asked Questions](#)

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A. Purpose and Scope

The purpose of this policy is to:

- Foster compliance with federal rules, regulations, policies, and guidelines by setting forth UCI policy regarding the disclosure, review, and approval of Engagements involving a Country of Concern.
- Implement a comprehensive framework for reviewing and approving Engagements involving a Country of Concern, including establishing a UCI process for complying with the President's [requirement](#) that certain Engagements involving a Country of Concern and Critical and Emerging Technology be reviewed and approved by the President.
- Assist the UCI community with understanding the risk associated with Engagements involving Countries of Concern.
- Assist the UCI community with understanding that Critical and Emerging Technology are important to U.S. national and economic security and research on or with these technologies requires careful review, risk identification, analysis, and mitigation, when necessary.
- Establish the UCI Office of Research as the unit responsible for this policy and the tools, processes, and procedures to implement it.

This policy is applicable to all UCI Engagement Leaders who will be or are involved in Engagements with a Country of Concern.

B. Definitions

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1. **Country of Concern:** The UC Office of the President has designated the countries listed in Section 19221 of the CHIPS and Science Act of 2022, and the U.S. Department of Education's report on institutional compliance with Section 117 of the Higher Education Act of 1965 as countries of concern. Due to possible future U.S. government actions, this is a dynamic list; please consult the [Countries of Concern Engagements webpage](#) for the complete, up-to-date list.
 2. **Critical and Emerging Technology:** This term refers to a specific and evolving list of technology areas published by the U.S. government. This is a dynamic list; please consult the [Critical and Emerging Technologies webpage](#) for the complete, up-to-date list.
 3. **Engagement:** Activities or relationships that involve significant or meaningful interaction, affiliation, collaboration, or exchange (including resource sharing) with an entity or non-UCI individual located in or associated with a Country of Concern AND
 - a. Critical and Emerging Technology; or
 - b. UCI research (regardless of funding source) including, but not limited to, sharing research data, information, outcomes, methods, and/or materials with the Engagement partner(s); or
 - c. The use of UCI/UC facilities and/or resources; or
 - d. Application to, or participation in, a [foreign talent recruitment program](#).

Engagements may be documented through an instrument such as, but not limited to, an agreement, contract, memorandum of understanding, or principles document. However, a signed or un-signed instrument is not a required feature for an activity or relationship to be an Engagement.

4. **Engagement Leader:** A UCI employee or appointee – typically a faculty member or UCI administrative official – who is leading UCI's participation in an Engagement. The Engagement Leader typically serves as the point of contact for an Engagement partner and the UCI administrative offices responsible for reviewing, approving, and/or supporting the Engagement. An Engagement may have more than one Engagement Leader.
5. **Enhanced Review and Approval:** A review and approval process required by the University of California President when Engagements involve: i) a country of concern, ii) Critical and Emerging Technology, and iii) the Engagement is undertaken by or on behalf of the University, a location, or any of its components. The approval process involves: i) a UCI review, ii) the Chancellor's approval, iii) review by key units at the UC Office of the President, and iv) the UC President's approval.

6. **Research Security and International Engagements Committee (RSIEC):** A committee established by the Provost/Executive Vice Chancellor, reporting to the Vice Chancellor for Research, and administratively supported by the Office of Research. The RSIEC is responsible for promoting and facilitating responsible international engagements by developing local policy and procedure to help ensure compliance with systemwide policy and U.S. government rules and regulations; overseeing UCI's research security and international engagement risk mitigation program; and reviewing and approving international engagements categorized as medium and high risk.

C. Responsibilities / Authority

1. Office of Research:

- a. Provide guidance and advice to Engagement Leaders, the RSIEC, and senior UCI officials regarding Engagement activities and plans, Engagement risk (such as legal, financial, reputational, and compliance), Engagement oversight and risk mitigation, and this policy.
- b. Maintain the Engagement [disclosure mechanism and oversee the Engagement review process](#).
- c. Review Engagements in accordance with this policy and established procedures.
- d. Provide administrative support to the RSIEC and coordinate the UCI portion of the Enhanced Review and Approval process.
- e. Confirm risk mitigation plan implementation prior to Engagement initiation, and periodically review Engagements for risk mitigation plan compliance.
- f. Coordinate with other offices and units to enforce this policy and address noncompliance.

2. Engagement Leader:

- a. Timely disclose Engagements to the University and ensure that all disclosures are complete and accurate.
- b. Cooperate with the Office of Research by providing accurate and complete facts and information about Engagements.
- c. Participate in the Engagement review process by providing input and insights about an Engagement, including how it will benefit UCI and its mission.
- d. Implement approved risk mitigation plans.

- e. Ensure that Engagements comply with applicable University and systemwide policies.
 - f. Promptly inform the Office of Research about any substantive change (proposed or actual) to an Engagement.
- 3. RSIEC:**
- a. Review and approve medium and high risk Engagements (see risk levels below).
 - b. Review Engagements involving Critical and Emerging Technology that require Enhanced Review and Approval, and recommend to the Vice Chancellor for Research, Provost/Executive Vice Chancellor, and Chancellor whether they should proceed.
- 4. Vice Chancellor for Research:**
- a. Serve as the appeal point and final decision regarding Engagements that do not require Enhanced Review and Approval.
 - b. As part of the Enhanced Review and Approval process, review the RSIEC's recommendation before it is presented to the Provost/Executive Vice Chancellor and Chancellor.
 - c. Provide advice to the Provost/Executive Vice Chancellor and Chancellor regarding Engagements that require Enhanced Review and Approval.
- 5. Provost/Executive Vice Chancellor:**
- a. Consult with and advise the Chancellor regarding Engagements that require Enhanced Review and Approval.
- 6. Chancellor**
- a. Make the final decision regarding whether Engagements requiring Enhanced Review and Approval should be approved and forwarded to the Office of the President for final review and decision.

D. Policy

1. Disclosing Engagements

- a. Engagement Leaders must disclose Engagements to the University through the Office of Research.

- i. They may delegate this responsibility to support staff, but they may not delegate accountability.
 - ii. Engagement Leaders should disclose early in the Engagement development process to avoid delays.
- b. An Engagement may not commence without disclosure, review, and as applicable a risk mitigation plan and approval.

2. Reviewing Engagements

- a. The Office of Research will review Engagements to:
 - i. Determine if they involve Critical and Emerging Technology,
 - ii. Identify potential compliance concerns,
 - iii. Rate risk as low, medium, or high,
 - iv. Develop a risk mitigation plan (if necessary), and
 - v. Identify other aspects that may be unique to an Engagement and require coordination with other UCI offices.
- b. The RSIEC must review and approve medium and high risk Engagements.
 - i. In some cases, Engagements involving Critical and Emerging Technology will require Enhanced Review and Approval.

3. Risk Assessment, Rating, Categorization, and Approval

- a. All Engagement reviews will result in a risk rating by the Office of Research.
- b. Rating risk is a wholistic activity that must consider all known facts and information regarding an Engagement, including input from Engagement Leaders.
- c. Rating Categories
 - i. Low risk: Where risk is minimal and does not require mitigation or management.
 - ii. Medium risk: Where risk may require mitigation or management to ensure a responsible Engagement.
 - iii. High risk: Where risk mitigation and management measures are required to ensure a responsible Engagement.

4. Engagement Conduct and Substantive Changes

- a. Engagements must adhere to all applicable University and systemwide policies and approved risk mitigation plans (if applicable).
- b. Engagements are dynamic by nature; therefore, Engagement Leaders must promptly inform the Office of Research about any substantive change (proposed or actual) to an Engagement.
 - i. Substantive changes require review by the Office of Research to determine if the Engagement's risk rating will or has changed. If so, the Engagement must be reviewed and approved commensurate with the new risk rating.

E. Exceptions

The following types of Engagements are excluded from this policy because they are subject to other policies and procedures that address research security and international engagement concerns:

1. Activities and affiliations disclosed through the [Federal Funding Proposal Review process](#).
2. Foreign collaborators, subawardees, components, etc. included in a federally sponsored award or a federal flow through subaward if disclosure was made in the federal funding application that resulted in the award or subaward.
3. Category I activities or relationships requiring prior approval under [APM-025](#) and [APM-671](#).
4. Activities subject the [Policy for Student International Activities](#) and the [Procedures for Student International Activities](#).
5. Visa applications subject to UCI's [Foreign Students and Foreign Scholars: Visa Guidelines](#).
6. Engagements subject to the [Policy on International Academic MOUs and Agreements](#).

F. Procedures

Procedures implementing this policy are maintained on the [Countries of Concern Engagements webpage](#) on the Office of Research website.

G. Noncompliance

Concerns regarding non-compliance with this policy may be reported to the Office of Research at or-rsie@uci.edu.

Applicable University and systemwide policies and procedures will be used to address noncompliance with this policy. Noncompliance may also result in actions, such as educational efforts and/or remediation up to and including Engagement termination.

H. Reporting

In accordance with [President Drake's August 28, 2023, letter to Chancellors establishing a framework for UC international affiliations and agreements involving emerging technology and countries of concern](#) and the [UC International Engagement Enhanced Review and Approval Guidance](#), the Office of Research must report Engagements requiring Enhanced Review and Approval to the UC Office of the President. In addition, the Office of Research will report to the Office of the President instances when high-risk Engagements commenced or were otherwise carried out or performed without approval as required by this policy.