Overview of UC's Research Security Program

Alexander A. Bustamante,
Senior Vice President and Chief Compliance & Audit Officer
Office of Ethics, Compliance and Audit Services

January 2024

UC Efforts Related to Research Security

The University of California has taken an enterprise approach to addressing research security issues.

o   Our compliance program is built on a risk-based framework for systematic identification of issues and a design of mitigation strategies.

o   UC has leveraged existing policies and procedures in creating an integrated approach, leveraging the independent Office of Ethics, Compliance, and Audit Services (ECAS).

o   UC's approach has focused heavily on a systemwide training and awareness program, targeted research and cyber audits, as well as enhanced investigative protocols and practices.

o   ECAS cultivated strategic collaborations with both internal and external stakeholders.

Training and Awareness

Ethics and Compliance Briefing for Researchers
Mandatory briefing for UC researchers taken every two years.

Research Security Video Shorts
Five-minute video shorts are provided as education and awareness resources for researchers and administrators across UC on the following subjects:
- Disclosures: Conflict of Interest & Conflict of Commitment
- Talent Recruitment Programs
- International Collaborations
- Data Security Awareness

International Travel Alerts and Messaging
Auto-generated messages addressing potential concerns regarding export control, research data security, sanctions, and other risks.

In-Depth Learning Modules for Export Control, Compliance, and Procurement Personnel

Revisions to UC Policy on Outside Professional Activities

Infographics and Alerts

Research Security Audits

Foreign Influence Audit

ECAS performed a systemwide audit to evaluate risks related to foreign influence that included the following areas:

o   Conflict of Interest
o   Conflict of Commitment
o   Export Control
o   Sponsored programs/grant processing
o   Development and alumni relations
o   Visas for international scholars and student/graduate studies
o   International activities
o   Academic departments and faculty
o   Intellectual property security and control
o   Training

Research Security Audits

Cybersecurity Audits

ECAS' Cybersecurity Audit Team performed a series of audits to assess systems and controls in place to protect research data and other highly sensitive information throughout the system, including:

- Systemwide Vulnerability Assessment and Penetration Testing Audits – Research and Emerging Technology
- Systemwide Threat Detection and Identification Audit
- Systemwide Critical Infrastructure Audits
- Systemwide Cyber-Resiliency Audit

Investigations

UC standardized Foreign Influence investigations

ECAS created escalation protocols requiring all foreign influence allegations to be immediately elevated to the highest levels of the institution, ensuring that ECAS and the Office of General Counsel have visibility.

Multi-disciplinary team reviews of allegations ensuring the thoroughness of investigations.

Designed detailed investigative plans for foreign influence investigations that outlined procedures for:
- Preserving and collecting physical and digital evidence
- Identifying relevant internal and external documents related to the allegations
- Conducting targeted, multi-lingual, media searches for publicly available information
- Created quality control procedures to ensure thorough and consistent investigations systemwide and appropriate disclosures to federal agencies

New Research Security Framework for International Affiliations

International Affiliations and Agreements involving "Countries of Concern" and "Emerging Technology"

Proposed Affiliations and Agreements

Prospective international affiliations and agreements involving both "Emerging Technology" and "Countries of Concern" must undergo an enhanced review and approval process.

Current Affiliations and Agreements

Develop a detailed inventory of all current international affiliations and agreements involving "Countries of Concern" to identify high risk engagements requiring further review or analysis.

Contact Information

Alexander A. Bustamante, Senior Vice President and Chief Compliance & Audit Officer
Alexander.Bustamante@ucop.edu

Office of Ethics, Compliance and Audit Services
University of California, Office of the President