Introduction

- Are you familiar with talent recruitment programs?
- Do you know how to participate in them appropriately?
- The University of California (UC) values and encourages international partnerships and global research.
- However, this collaborative approach may malign foreign influence and risk exploitation.
- You can help UC adhere to government guidelines and support research integrity.
- Let’s talk more about how to recognize talent recruitment programs, risks of participation, and reporting requirements.

Talent Recruitment Programs

- A talent recruitment program is any foreign government-run or -funded program meant to attract individuals who are working or educated in the U.S.
- Talent recruitment programs may aim to acquire U.S.-funded research and technology in exchange for financial support and other resources.
  - These programs recruit individuals of all nationalities and often target scientists, engineers, academics, and researchers.
- It is important to note that not all talent recruitment programs look alike.
- They have varying names, depending on the country of initiation, and can be associated with any country’s government.

Risks

- Many countries sponsor recruitment programs to attract researchers for legitimate purposes.
- However, be aware of programs that require or encourage criminal and unethical behaviors.
- This may look like:
  - Creating undisclosed conflicts of commitment and conflicts of interest with your obligations to UC or funding agencies
  - Misattributing awards, patents, publications, and projects to the foreign institution; and
  - Replicating or transferring U.C.- or agency-funded work to another country
- You are not prohibited from participating in talent recruitment programs altogether.
- But conditions of such programs may conflict with federal agencies or UC policies and sponsor requirements.
- Some participation may also pose risks to U.S. national security.
- Therefore, certain agencies may prohibit participation in talent recruitment programs by their grantees.

Reporting Requirements

- To protect everyone involved, you should disclose foreign relationships and activities in accordance with UC policy and sponsor requirements.
- Carefully review all agreements and thoroughly vet all arrangements with foreign entities.
- Make necessary disclosures related to conflict of interest and conflict of commitment, per UC policy.
Disclose participation in a recruitment program through the UC Outside Activities Tracking System (OATS).

Your participation may also require disclosure of conflicts of interest. Follow your campus process for submitting the required disclosure forms.

Report involvement with recruitment programs to federal sponsors through other support pages (e.g., NIH)

Also, update biographical sketches to include foreign affiliations, even positions with no remuneration or which are voluntary.

- Disclose obligations to a talent recruitment program to avoid:
  - Violating federal disclosure requirements, which could result in prohibition from participating in federally sponsored research, as well as financial implications to UC or your lab.

- Disclose details such as:
  - patent ownership, required research visitors in the faculty member’s lab, and required publications

- If you are unsure about terms, conditions, or expectations related to your international engagements, consult your local Office of Research.
  - Your department chair and other UC experts can review your situation and offer guidance.

- You may also contact your department leadership, compliance offices and office of general counsel if you are approached by representatives of a federal agency or law enforcement.

Conclusion

- The UC believes research and academic scholarship work best with open collaboration.
- Thank you for your careful consideration about decisions to pursue and disclose foreign engagements.
- Together, we can safely preserve UC’s ability to engage internationally.
- For more information, contact your local campus Research Compliance Office or Conflict of Interest Expert.
- This message has been brought to you by the University of California Ethics, Compliance & Audit Services and Risk & Safety Training.

Resources:

- Foreign Influence (UCOP, Ethics, Compliance and Audit Services)
- Foreign Government Sponsored or Affiliated Activities (Department of Energy Order 486.1A)
- Conflict of Interest Coordinators (UCOP)
- UC Conflict of Commitment Policies (APM 025, APM 240, APM 246, APM 671)
- UC Outside Activity Tracking System (OATS)