



**UF Research**  
Research Integrity, Security & Compliance

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April 30, 2026

Committee On Education and Workforce  
U.S. House of Representatives  
2176 Rayburn House Office Building  
Washington, DC 20515-6100

Dear Chairman Walberg,

Attached, please find responses to the questions for the record related to the March 26, 2026, Committee on Education and Workforce hearing titled "U.S. Universities Under Siege: Foreign Espionage, Stolen Innovation, and the National Security Threat." Should the Committee have any additional questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Cassandra Farley".

Cassandra C. Farley, MBA, CCEP  
Senior Director, Research Integrity, Security & Compliance

Enclosure: Response to Questions for the Record

House Committee on Education and Workforce Hearing  
“U.S. Universities Under Siege: Foreign Espionage, Stolen Innovation, and the National Security Threat.”

**Chairman Tim Walberg (R-MI-7)**

**1. Ms. Farley, how does the University of Florida mitigate risks associated with entities appearing on U.S. government watchlists or export control lists?**

The University of Florida, in accordance with the UF Policy on Export Control Compliance<sup>1</sup>, prohibits all engagements with entities on a U.S. government restricted party list without the prior written approval of the university Export Control Officer.

Florida Statute prohibits engagements with regulatorily defined Foreign Principals based in foreign countries of concern<sup>2</sup>, without prior approval of the Florida Board of Governors.

**a. Are such partnerships prohibited, subject to enhanced due diligence, or allowed with exceptions?**

The University of Florida prohibits all engagements with entities on a U.S. government restricted party list without the prior written approval of the Export Control Officer. Since the implementation of the policy, no exemptions to the prohibition have been granted.

Florida Statute prohibits engagements with entities in countries of concern without the prior approval of the Florida Board of Governors. To date, UF has not requested Florida Board of Governors approval to enter into an agreement or partnership with an entity based in a foreign country of concern.

**b. Who approves exceptions, and what documentation is required?**

A request for an exemption to UF policy prohibiting engagements with parties on a U.S. government restricted party list requires the following documentation:

- Demonstration of a significant benefit to the institution;
- Identified risks to the institution and the U.S. and a proposal to mitigate or eliminate such risks; and
- Approval from the federal agency that manages the relevant restricted party list, in accordance with the federal regulations.

Prior to pursuing federal agency approval or granting an exemption, the Export Control Officer will route the request for review and approval by Vice President for Research and UF General Counsel, who consult with the university president and Chair of the Board of Trustees.

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<sup>1</sup> <https://policy.ufl.edu/policy/export-control-compliance/>

<sup>2</sup> [https://www.flbog.edu/wp-content/uploads/2023/08/Full\\_Board\\_AREC\\_01a\\_Regulation\\_9.012\\_CE.pdf](https://www.flbog.edu/wp-content/uploads/2023/08/Full_Board_AREC_01a_Regulation_9.012_CE.pdf)

For engagements with entities or Foreign Principals based in a foreign country of concern, the university must obtain prior approval from the Florida Board of Governors. The process for requesting such approval is outlined in the relevant Florida Board of Governors regulation and guidance document<sup>3</sup>. In accordance with that guidance, to obtain approval the university must provide the following information to the Florida Board of Governors:

- Description of the activity, including the activity’s overall purpose, the expected benefits to the institution, and any identified risks to the safety or security of the United States and its residents from the activity;
- Financial and personnel information related to the activity; and
- Documentation that the activity request has been approved by the university President and Chair of the Board of Trustees.

**c. Are these decisions reviewed at a senior leadership or board level?**

In addition to review by the Export Control Officer, any requests to engage with parties on a U.S. government restricted party must also be reviewed and approved by the Vice President for Research and UF General Counsel, who consult with the university president and Chair of the Board of Trustees.

Requests to engage with any entities or Foreign Principals based in a foreign country of concern are reviewed and approved by the University President and the Chair of the Board of Trustees prior to submission to Florida Board of Governors for approval.

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<sup>3</sup> [https://www.flbog.edu/wp-content/uploads/2023/10/Foreign-Influence-Guidance-Documents\\_101923.pdf](https://www.flbog.edu/wp-content/uploads/2023/10/Foreign-Influence-Guidance-Documents_101923.pdf)