

Written Testimony of Cassandra C. Farley
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House Committee on Education & Workforce

“U.S. Universities Under Siege: Foreign Espionage, Stolen Innovation, and the National Security Threat”

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Chairman Walberg, Ranking Member Scott, distinguished committee members, and fellow witnesses:

Thank you for the opportunity to testify today on this important topic. I am Cassandra Farley, Senior Director of Research, Integrity, Security and Compliance, the University of Florida’s (UF) office that oversees multiple research compliance programs for our institution. In this role, I serve as the research security officer and oversee UF’s research security program. I am here today on behalf of the University of Florida and to speak to the committee about this program.

UF has a long history of international education, research, and service. A large land-grant university, UF is home to 16 colleges and more than 170 research centers and institutes. The university offers over 300 degree programs and every fall welcomes nearly 65,000 students to our campus in Gainesville, Florida. This past fiscal year, UF had over \$1.33 billion in external research expenditures, which included funding from federal, state and industry partners. Classified as an R1 institution by the Carnegie Classification of Institutions, UF is a research-intensive university. In the same time period, UF received over \$817 million in awards from federal granting agencies, with significant funding coming from Health and Human Services (\$459.1 million), U.S. Department of Agriculture (\$102.0 million), and the National Science Foundation (\$68.38 million). As our Vice President for Research, Dr. David Norton, recently said, “UF’s partnership with federal agencies helps our faculty solve some of society’s most pressing problems in health care, agriculture, national security, space and many other areas.”

In this testimony, I will discuss UF’s research security program, which includes screening of researchers, export control compliance, collaboration and agreement reviews, international travel review and approval, annual reporting to our state and federal partners, and training. I will also discuss several Florida Statutes that are the foundation of our program. UF’s robust research

security program helps the university remains compliant while enabling and encouraging groundbreaking, world-changing research in partnership with federal granting agencies.

Background

Starting in 2018, our federal partners notified universities of increasing concerns about the potential threats of undue foreign influence, particularly from entities within the People's Republic of China. One source of this potential undue influence came in the form of talent programs, in which researchers signed agreements that required them to work in support of labs in China, publish federally funded research findings using a China-based institutional affiliation, and recruit others into the programs. In general, participation in these programs was not appropriately disclosed to the researcher's employer or federal sponsors, in violation of institutional policies and granting agency regulations. In response to these concerns, federal agencies began clarifying their policies and expectations, and President Trump released National Security Presidential Memorandum 33 (NSPM-33), which directed the Office of Science and Technology Policy to develop research security program requirements for implementation by federal agencies.

During this period, Florida government officials expressed similar concerns related to Florida universities and colleges, and in 2021 the Florida Legislature unanimously passed "An Act Relating to Foreign Influence," which implemented a series of state statutes with the intent to protect Florida universities and colleges from undue foreign influence. Governor DeSantis signed them into law. Over the next few years, the legislature further modified and refined the statutes, which remain in place today and are the underpinnings of UF's research security program.

Upon passage of the Act, and in consideration of impending federal requirements, UF assembled a task force comprised of key leaders from across the UF enterprise. The taskforce met weekly to design and implement UF's research security program, building an effective, compliant program that protects state and federally funded research. In structuring this compliance program, UF intentionally housed all program components centrally, rather than within individual colleges. This structure helps with efficient, consistent reviews as well as oversight by UF leadership.

Over the last several years, the university also invested in several technological solutions to enable researchers and staff to easily submit information for review as required by state and federal regulations. These tools include our university-wide outside activity disclosure system; a grants management system to facilitate submission of proposals and negotiation and execution of agreements; and applicant tracking systems to facilitate reviews of applications for research and research support roles. Where possible, UF has integrated these systems to minimize the

number of touchpoints and help ensure each office supporting compliance processes has the information it needs to conduct timely and thorough reviews.

Upon rollout of each program component, my office, in partnership with other relevant central offices, engaged directly with leaders across the university, meeting with chairs and deans in every college to explain the program, the governing regulations, and the importance of research security. This top-down approach to change has meaningfully supported UF's efforts to build a culture of compliance at our institution.

Finally, UF has added new positions to several offices and designed and implemented new processes and procedures related to hiring researchers, approving international travel, and reviewing and approving institutional agreements. UF's significant investment in this program is a testament to its deep and ongoing commitment to research security.

Florida Statutes Related to Undue Foreign Influence

There are currently five Florida statutes related to the prevention of undue foreign influence at Florida universities. The statutes contemplate relationships with, and gifts from, statutorily defined Foreign Countries of Concern, which are the People's Republic of China, the Russian Federation, the Islamic Republic of Iran, the Democratic People's Republic of Korea, the Republic of Cuba, the Venezuelan regime of Nicholas Maduro, or the Syrian Arab Republic, or any agency of or any other entity under significant control of such foreign country of concern. I'll discuss each statute briefly in turn.

F.S. 1010.25 Twice yearly, Florida universities must report to the Florida Board of Governors any contract, gift, grant, endowment, award, or donation of money or property of any kind that is received directly or indirectly from a foreign source and has a cumulative value of \$50,000 or more during the fiscal year.

F.S. 1010.26 Florida universities must establish an international travel program to review and approve all international business travel. As part of the travel review, universities must confirm that travelers have certified that they will follow all university travel policies, state statutes, and federal laws and regulations, including export control regulations. Additionally, universities must annually report all employee business travel to Foreign Countries of Concern to the Board of Trustees.

F.S. 1010.35 Florida universities are required to screen all research and research support positions prior to hiring applicants or granting them access to research data or materials. The statute also requires that universities collect certain required information from applicants, including education and employment history, foreign affiliations, and details about the proposed area of research. Universities must use this information to screen applicants. Screening

units approve applicants for hire only after making risk-based determinations that consider the nature of the research and the background and ongoing affiliations of the applicant.

F.S. 286.101 Universities and their employees may not solicit or accept any gifts of any value from people domiciled in, or entities based in, Foreign Countries of Concern while acting in their professional capacity.

F.S. 288.860 Universities are prohibited from entering into agreements, collaborations, or partnerships with entities or people domiciled in a country of concern without the prior approval of the Florida Board of Governors. Annually, universities must report all grant programs, agreements, partnerships, and contracts with entities or statutorily defined Foreign Principals in Foreign Countries of Concern to the Florida Board of Governors, regardless of whether funds were exchanged.

University of Florida's Research Security Program

With a research portfolio exceeding \$1.33 billion annually, UF continues to act as an accountable steward of resources, while meeting its obligations to sponsors and stakeholders. As required by both Florida statute and federal granting agency regulations, UF conducts a variety of screenings and reviews to maintain the security of the research enterprise. For each category of screening, UF utilizes a risk-based review and approval process. As a matter of policy, UF will not enter into contracts or other agreements, do business with, or engage in any activity with entities on a U.S. government restricted party list.¹

Program Components

Researcher and Visitor Screening. Prior to interviewing or offering applicants a research or research support position, UF reviews and evaluates all application materials and approves all hires. The review, which includes all new researchers, includes background screening; transcript verification; and evaluation of education and employment history, ongoing international affiliations and current and pending sponsored program support. UF uses a risk-based review process that considers a variety of factors including the nature of the research and the background and ongoing affiliations of the applicant.

Award and Agreement Review. UF reviews all international agreements, regardless of funding source or agreement type. During the review, UF considers the nature of the agreement, the source of funds, place of performance, sponsor, planned travel, and potential intellectual property concerns. UF will not enter into agreements or partnerships with Foreign Principals without the prior approval of the Florida Board of Governors.

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

Export Control Compliance. Export controls are a complex set of federal laws and regulations that govern the transfer of technology, information, and commodities overseas or to a foreign national within the U.S. UF reviews and oversees all activities that are export-controlled, assisting researchers who are working on export-controlled research, traveling, shipping, or collaborating internationally.

International Travel Review. Prior to travel, UF reviews all international travel undertaken in support of UF business. Additionally, UF requires all international travelers to certify that while traveling they will comply with relevant state and federal laws as well as applicable UF policies and directives, including UF Policy on Export Control, UF Policy on Intellectual Property and UF directives on international travel and taking UF assets abroad.

Training. All federal research award personnel are required to take research security training annually, as mandated by the CHIPS and Science Act. Additionally, any researcher conducting export-controlled research must take additional training related to export control compliance.

State Reporting. Twice a year, UF reports any contract, gift, grant, endowment, award, or donation of money or property of any kind received directly or indirectly from a foreign source with a cumulative value of \$50,000 or more during the fiscal year to the Florida Board of Governors. UF also submits an annual report to the Florida Board of Governors relating to all grant programs, agreements, partnerships, and contracts between itself and: (a) any colleges and universities based in a Foreign Country of Concern or (b) any Foreign Principals.

Federal Reporting. UF remains compliant with federal regulations and submits the biannual federal Foreign Gift and Contract report to the US Department of Education in accordance with Section 117 of the Higher Education Act of 1965 (HEA). UF also annually submits the Foreign Financial Disclosure Report to the National Science Foundation as mandated by the CHIPS and Science Act of 2022.

Conclusion

Through strategic investments in our research security program, and partnership and collaboration at both the state and federal levels, the University of Florida continues to demonstrate that it can support and enable innovative and groundbreaking research, while meaningfully working to secure the research enterprise.