

# Newsletter



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## Ransomware: Is Your Research Data Protected?

BY MICHAEL CORN

Recently a UCSD faculty member lost approximately six years of irreplaceable research data to a ransomware attack. Ransomware is a variety of malware (think computer virus) that encrypts files and then holds them hostage. It requires a payment, typically in bitcoin, providing you with the decryption tools. Ransomware is big business for cybercriminals, and has recently received a lot of notoriety for attacks on major cities and services (see the [CNN](#) and [Washington Post](#) news stories).

At UC San Diego we detect and block, on average, a dozen ransomware events per month and typically see one to two successful infections. In the case of the campus incident mentioned above, there were several factors that permitted the ransomware to infect the laboratory, for example a lack of antivirus software and a rarely used laptop that as a consequence of not being powered on was not receiving software updates. However the real issue was an inadequate backup strategy for the critical research data. Many research centers and

laboratories (especially those producing very large data sets) lack a robust data backup strategy.

Backing up voluminous research data requires a bit more thought than a “set it and forget it” approach we might take with laptops or workstations. Storing hundreds of terabytes or even petabytes of data requires careful planning around:

- ▶ What data am I required to keep and make available by my funding agency?
- ▶ What data will need to be kept to support longitudinal studies (current or future)?
- ▶ What data will need to be kept close to and available for computational analysis?
- ▶ How do I transmit that much data over the network?
- ▶ What data can I eliminate once I’m through with it?

The UC San Diego laboratory that suffered from this attack was making a daily copy of their primary data storage environment, but because of a lack of review, no one noticed the files being encrypted for three days. By the time it was noticed, the encrypted (and now useless) files

had overwritten the original data. To avoid encouraging hackers to target UC San Diego, the campus does not recommend nor support the paying of a ransom.

***At UC San Diego we detect and block, on average, a dozen ransomware events per month and typically see one to two successful infections.***

If you do believe your research data may be under a ransomware attack or simply would like to consult with a security engineer about your environment’s data security, contact the Office of Information Assurance at [security@ucsd.edu](mailto:security@ucsd.edu).

Please visit the [Research IT Services website](#) for information regarding the campus storage options or contact the research ITS team at [research-it@ucsd.edu](mailto:research-it@ucsd.edu).

While it’s still important to ensure you are patching your computers and running anti-malware software, if your laptops and research data are backed up, even the most sophisticated ransomware can be easily thwarted!

## BEST PRACTICES FOR SUMMER INTERNSHIPS WITH INDUSTRY

BY DAVID GIBBONS, PE

Summer internships represent a great opportunity to place graduate students with leading companies across California and beyond. Not only do they expose students to potential employers after graduation, they can also forge lasting relationships between the research laboratory and company. There are a few fine points though that Principal Investigators (PIs) and graduate students should be aware of prior to accepting an internship opportunity.

First, graduate students like all UC employees, are subject to a [patent policy](#) which automatically vests all inventions they make with the UC Regents. As nearly all summer employers will expect the student to assign intellectual property (IP) they create at the company to the company, it's important that this is managed early on to avoid conflicts later. Prior to accepting an internship, the graduate student, PI and host company should clearly discuss the intended scope of the student's involvement at the company. Internship projects should ideally be unique from the student's UC San Diego studies, but at a minimum should not involve the use of unpublished algorithms, software or research plans from campus. If UC San Diego research ends up integrated within the summer project, it may be very difficult for the campus to waive ownership rights for the student's part of any patents filed by the company. This can quickly lead to strained relations with the company and hurt future engagement opportunities. It is important to note that



UC San Diego sees the student's timely graduation and freedom to publish as the top priority, so internships should preferably further that goal.

Once an internship results in a new invention naming a student inventor, that invention should be disclosed to [UC San Diego's Office of Innovation and Commercialization](#) (OIC) with a request for waiver of UC ownership. The waiver request should spell out clearly the context of the invention's creation and that no UC resources, funding or facilities were used in its development. A copy of the student's internship paperwork (IP agreement) is also requested. Once received,

OIC will confer with the PI to confirm that the internship work is separate from the student's UC San Diego work and did not benefit from campus resources, including unpublished research plans or results, including software. If all clear, a waiver letter is provided to the student which they can present to the company for their files.

The above suggestions are meant to provide a clear path to successful internships and company relations with the campus. Not following these suggestions can result in breach of contract with other funding sources (Federal and private sponsor obligations), potential export violations and a potential loss of IP rights for the laboratory, including compromised freedom of use for your own research.

For questions or assistance on these matters, please contact David Gibbons, PE, Assistant Director, OIC at [dgibbons@ucsd.edu](mailto:dgibbons@ucsd.edu), (858) 534-0175.

## Institutional Animal Care and Use Protocol-Grant Congruency Verification

BY THE UC SAN DIEGO IACUC OFFICE

The National Institutes of Health (NIH), National Science Foundation (NSF) and most federal extramural funding agencies require verification that the Institutional Animal Care and Use (IACUC) has approved all proposed animal studies before they will fund grant proposals. The NIH Grants Policy Statement states, "It is an institutional responsibility to ensure that the research described in the application is congruent with any corresponding protocols approved by the IACUC." The Office of Laboratory Animal Welfare oversees the care and use of research animals in Public Health Service funded research and defines congruency as "agreement between the animal activities described in a grant and the animal activities reviewed and approved by the IACUC."



At UC San Diego, the IACUC Office performs the congruency review and provides confirmation of the IACUC approved protocols. The Sponsored Project Offices (OCGA, HSSPPO and SIO) work directly with IACUC Office to attain assurance of congruency. Generally, this occurs if a Just-in-Time (JIT) notice is received or when funding is imminent. The Sponsored Project Offices will provide the assurance to the funding agency.

No expenditures for activities with live vertebrate animals may be charged to an NIH

grant if there is not a valid IACUC approval. Principal Investigators should submit and/or routinely amend their animal use protocols to match any new or supplemental grant proposals to avoid delays at funding time.

Please see the [NIH Grants Policy Statement](#) (NIH GPS, chapter 4.1.1.2) for additional information.

For additional information regarding grant congruency or the IACUC processes, please contact the IACUC at [iacuc@ucsd.edu](mailto:iacuc@ucsd.edu) or (858) 534-6069.

# Updates of Financial Interests

BY JENNIFER J. FORD



## DID YOU ACQUIRE A NEW FINANCIAL INTEREST? YOU MAY NEED TO PROVIDE AN UPDATE OF FINANCIAL INTEREST TO THE CONFLICT OF INTEREST (COI) OFFICE.

When University Investigators are awarded sponsored research or other related activities (i.e. gifts, services, material transfer agreements, etc.) and have new financial interest(s), the University Investigator must submit an update of financial interest within 30 days for Public Health Service (PHS) funded projects to the Conflict of Interest (COI) Office. A financial interest is anything of monetary value, whether that value can be easily determined or not, that is held by the investigator, their spouse or registered domestic partner, and dependent children and meets reporting categories and thresholds for the applicable COI disclosure form. As a reminder, Investigators must disclose financial interests received from a foreign Institution of higher education or the government of another country (which includes local, provincial, or equivalent governments of another country).



## WHAT IS A NON-FEDERAL FUNDED PROJECT?

The State of California requires that University Investigators disclose their financial interests when their research project is being funded or supported in whole or in part by a non-federal

funded project, such as a non-profit foundation or for-profit company, either directly or through a subaward.

**A financial interest is anything of monetary value, whether that value can be easily determined or not, that is held by the investigator, their spouse or registered domestic partner, and dependent children and meets reporting categories and thresholds for the applicable COI disclosure form.**



## WHAT IS A FEDERAL NON-PHS FUNDED PROJECT?

Federal regulations, as well as University of California policy, require Investigators to disclose certain significant financial interests. Federal Non-PHS funded projects are funded by the National Science Foundation (NSF) and other Federal Non-PHS agencies with conflict of interest disclosure requirements as well as the California Institute for Regenerative Medicine and certain University of California Programs, either directly or through a subaward.



## WHAT IS A PUBLIC HEALTH SERVICE (PHS) FUNDED PROJECT?

The Public Health Service (PHS) regulations require all research sponsored by PHS, including the National Institutes of Health (NIH) and other non-federal sponsors who have adopted the PHS FCOI regulations, require disclosure of significant financial interests by Investigators who participate in PHS funded research either directly or through a subaward. In addition, all Investigators are required to complete PHS training prior to engaging in PHS funded research and at least every four years while engaging in PHS funded research.



## WHAT HAPPENS IF I DO NOT DISCLOSE IN A TIMELY MANNER?

Under Public Health Services (PHS) regulations when there is a financial conflict of interest (FCOI) and an Investigator has not disclosed in a timely manner, the Institution is required to perform a "retrospective review" to determine whether any PHS funded research conducted during the time period where the FCOI was not reported, biased in the design, conduct or reporting of the research. If bias is determined by the Institution, the funding agency must be informed with a mitigation plan.

For questions or additional information, please contact the Conflict of Interest Office at [info@coi-ucsd.edu](mailto:info@coi-ucsd.edu), (858) 534-6465 or visit the [Conflict of Interest Office website](#).

# CAPITAL EQUIPMENT MANAGEMENT AT UC SAN DIEGO: THE BIG PICTURE

BY JAMIE WHEAT, MA, CPPA

**Capital Equipment Management (CEqM)** is the central office that manages inventorial equipment assets and shares that responsibility with Departmental Equipment Custodians and Administrators. In addition, this office manages the Campus Asset Management System (CAMS), which is the system of record for asset reporting and inventory control.

As the office with primary responsibility for inventory control, financial reporting, and policy support, it is critical for our staff to have thorough knowledge of all property regulations to ensure our work and service is in the best interest of the university (e.g. Federal Acquisition Regulations (FAR), Uniform Guidance (UG)). This includes that we adequately follow all laws and regulations with respect to the Import or Export of assets or material. Our job is to safeguard university assets and prevent incidents like the one reported by WHO-DT News reporter, Aaron Brillbeck, where a graduate student was caught trying to sell campus resources and information to China. For additional information, see the article, "[ISU Student Accused of Funneling Military Secrets to China.](#)"

There are more than 28,000 pieces of capital equipment in the

care and custody of UC San Diego valued over \$1 billion, and located all over the world. The university is required to inventory 100% of these assets every two years ([2 CFR section 200.313\(d\)\(2\)](#) page 118, and [UC-BFB-29](#)), and the CEqM office supports this effort campus-wide. CEqM is responsible for the cost reconciliation for each piece of equipment acquired by the university, which includes an aggregate amount of the equipment and its components, and allowable capital expenditures (>\$5,000 with a useful life >1 year, owned or in UCSD custody, non-expendable, this includes fabrications). Examples of common methods of acquisition for capital equipment include purchase orders, fabrications, donation/gifts, and government contracts (Government Furnished Property–GFP and Contractor Acquired Property –CAP).

CEqM is responsible for the classification of all capital equipment acquisitions, physical inventory, and contract property closeout reports. The FY17/18 equipment capitalization report recorded \$172 million in new equipment acquisitions (approximately 2,300 capital assets). The equipment is located across campus within 770+ buildings, in the ocean and in other

countries. Departments utilize CAMS to maintain current asset data elements that are in turn captured for centralized reporting, valuation, utilization, inventory and disposal.

**There are more than 28,000 pieces of capital equipment in the care and custody of UC San Diego valued over \$1 billion, and located all over the world.**

An effective capital equipment management system requires collaborative relationships with campus colleagues. This office works with our campus partners to inform, train and guide staff, faculty and researchers on federal compliance regulations, export control, financial controls, risk mitigation, accountability, policy and process improvement in response to new and ongoing university-wide initiatives.

CEqM has worked diligently to forge strong relationships with federal agencies, UCOP, Plant Accounting, Integrated Procure-to-Pay Solutions (IPPS), Office of Contracts and Grants, Advancement, the Controller, Office of Post Award Financial Services (OPAFS), Financial Analysis Office, Information Technology Services (ITS), Export Control, and Audit &

Management Advisory Services. In addition, the goal of this unit is to provide project leadership and support in the effort to safeguard university property, and provide quality service to our sponsors,

researchers, students, faculty and staff.

**Please contact us if you have any questions regarding the management of your capital equipment or visit our [website](#).**

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## INTERNATIONAL RESEARCH

## EXPORT CONTROL: Review of Controls for Certain Emerging Technologies

BY BRITTANY WHITING

The Department of Commerce Bureau of Industry and Security (BIS) announced on November 19, 2018, an advance notice of proposed rulemaking to seek public comment on criteria for identifying emerging technologies that are essential to U.S. national security, for example because they have potential conventional weapons, intelligence collection, weapons of mass destruction, or terrorist applications or could provide the U.S. with a qualitative military or intelligence advantage. UC San Diego is a leader in many of these emerging technologies, especially in engineering, biological and health sciences. Resulting regulations could impact research through an increase export licensing requirements for physical exports and for proprietary technology exchange with foreign countries.

As part of the National Defense Authorization Act (NDAA) for Fiscal Year 2019, Congress enacted the Export Control Reform Act of 2018 (the Act). Section 1758 of the Act authorizes Commerce to establish appropriate controls, including interim controls, on the export, reexport, or transfer (in country) of emerging and foundational technologies. This interagency process is anticipated to result in proposed rules for new Export Control Classification Numbers (ECCNs) on the dual use Commerce Control List. Commerce does not seek to expand jurisdiction over technologies that are not currently subject to the Export Administration Regulations (EAR), such as "fundamental research" described in [§ 734.8](#) of the EAR.

### Representative Technology Categories

The representative general categories of technology for which Commerce currently seeks to determine whether there are specific emerging technologies that are essential to the national security of the United States include:

1. Biotechnology, such as: (i) Nanobiology; (ii) Synthetic biology; (iv) Genomic and genetic engineering; or (v) Neurotech.
2. Artificial intelligence (AI) and machine learning technology, such as: (i) Neural networks and deep learning (e.g., brain modelling, time series prediction, classification); (ii) Evolution and genetic computation (e.g., genetic algorithms, genetic programming); (iii) Reinforcement learning; (iv) Computer vision (e.g., object recognition, image understanding); (v) Expert systems (e.g., decision support systems, teaching systems); (vi) Speech and audio processing (e.g., speech recognition and production); (vii) Natural language processing (e.g., machine translation); (viii) Planning (e.g., scheduling, game playing); (ix) Audio and video manipulation technologies (e.g., voice cloning, deepfakes); (x) AI cloud technologies; or (xi) AI chipsets.
3. Position, Navigation, and Timing (PNT) technology.
4. Microprocessor technology, such as: (i) Systems-on-Chip (SoC); or (ii) Stacked Memory on Chip.
5. Advanced computing technology, such as: (i) Memory-centric logic.
6. Data analytics technology, such as: (i) Visualization; (ii) Automated analysis algorithms; or (iii) Context-aware computing.
7. Quantum information and sensing technology, such as (i) Quantum computing; (ii) Quantum encryption; or (iii) Quantum sensing.
8. Logistics technology, such as: (i) Mobile electric power; (ii) Modeling and simulation; (iii) Total asset visibility; or (iv) Distribution-based Logistics Systems (DBLS).
9. Additive manufacturing (e.g., 3D printing);
10. Robotics such as: (i) Micro-drone and micro-robotic systems; (ii) Swarming technology; (iii) Self-assembling robots; (iv) Molecular robotics; (v) Robot compliers; or (vi) Smart Dust.
11. Brain-computer interfaces, such as (i) Neural-controlled interfaces; (ii) Mind-machine interfaces; (iii) Direct neural interfaces; or (iv) Brain-machine interfaces.
12. Hypersonics, such as: (i) Flight control algorithms; (ii) Propulsion technologies; (iii) Thermal protection systems; or (iv) Specialized materials (for structures, sensors, etc.).
13. Advanced Materials, such as: (i) Adaptive camouflage; (ii) Functional textiles (e.g., advanced fiber and fabric technology); or (iii) Biomaterials.
14. Advanced surveillance technologies, such as: Faceprint and voiceprint technologies.

### BIS welcomes comments on:

1. How to define emerging technology to assist identification of such technology in the future;
2. Criteria to apply to determine whether there are specific technologies within these general categories that are important to U.S. national security;
3. Sources to identify such technologies;
4. Other general technology categories that warrant review to identify emerging technology that are important to U.S. national security;
5. The status of development of these technologies in the United States and other countries;
6. The impact specific emerging technology controls would have on U.S. technological leadership;
7. Any other approaches to the issue of identifying emerging technologies important to U.S. national security, including the stage of development or maturity level of an emerging technology that would warrant consideration for export control.

### How Can You Help

Since many of these technologies are technologies that UC San Diego is at the forefront of developing, researchers are encouraged to provide comments to Brittany Whiting, Export Control Officer, at [brwhiting@ucsd.edu](mailto:brwhiting@ucsd.edu) or (858) 534-4175, by December 12, 2019, in order to file comments with the Department of Commerce for the filing deadline of December 19, 2018.



## Using Business Process Improvement to Better Support Our Research Enterprise



BY LINDA COLLINS

**Last year UC San Diego received over \$1.2 billion in awarded research funding.** This funding is supported by an increasing trend of proposal applications being submitted to our sponsors each year. During the first quarter of FY19, the number of proposals submitted by UC San Diego researchers increased by 38% over the same period from FY18! During the last 5 years, [proposal activity has increased 17% and awards have increased by 20%](#). While these increases are impressive, the administrative support resources that support this long term increasing trend have remained relatively flat.

To effectively and efficiently support our dynamic research community with this increasing volume, UC San Diego, as one of the top research institutions in the country, needs to ensure that our business practices are equally dynamic. We must continuously improve the way we conduct our business and become increasingly collaborative in terms of administrative processes that support research. We must not simply rely on the practices and habits set in place over decades, but seek to modernize our approach, challenge the past norms, and identify ways to work smarter so that we can operate more efficiently as our world class institution continues to grow. However, we also need to be vigilant in meeting our obligations to our sponsors and regulators through increasing focus on research compliance areas such as Export Control, Conflict of Interest, protections to patient information and data, to name a few examples.

To meet these challenges, a comprehensive approach to business process improvement for research administration is underway with the development of a new system, [Kuali Research](#), as part of the broader campus [Enterprise Systems Renewal](#) effort. Kuali Research has been selected as our future contract and grant sponsored research enterprise system, replacing Coeus ePD and other modules that have been utilized to support the contract and grant activity for the past 20 years. Efforts have been underway since October 2017 to ensure that the Kuali Research

system, when designed and configured, sheds historically inefficient and unnecessary business practices in order to streamline and improve the overall research administration pre and post award business process.

The goal is to better meet customer needs and relieve increasing demands on our Research Administrators who currently use multiple disconnected processes and systems that leave them without the most optimal tools to effectively serve their Principal Investigators. To achieve this, subject matter experts from numerous central and departmental offices have been engaged in process review and re-design efforts following the [Lean Six Sigma](#) methodology. This technique has successfully been applied in manufacturing and corporate efforts to reduce/eliminate waste, and achieve overall process improvements and streamlining in those markets.

The UC San Diego subject matter experts, [Kuali Research Project Team](#) and other stakeholders responsible for overseeing the development of this new system, participated in a one day training about the Lean Six Sigma methodology. With this effort, they experienced first-hand the improvements that can be attained towards efficient business processes that will provide better value to the researchers we serve. Additionally, in-house certified [Lean Six Sigma “black-belt” experts](#) are being tapped to lead full-scale process improvement efforts across many facets of our pre and post award research administration lifecycle.

All of this means changes are coming; positive changes to the way UC San Diego conducts research administration, including visibility and transparency of the entire pre-award life-cycle of proposal development, review and submission. For more information on the ESR Program, Kuali Research Project and/or Business Process Improvement, email [esr-researchadmin@ucsd.edu](mailto:esr-researchadmin@ucsd.edu) or contact Nicole Joyce, Kuali Research Change Lead and Change Practitioner at [njoyce@ucsd.edu](mailto:njoyce@ucsd.edu).



## RESEARCH COMPLIANCE HOT TOPICS AND TRAINING PROGRAM

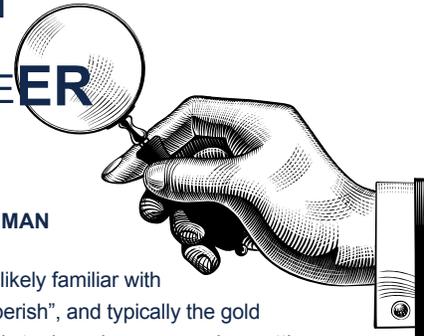
The UC San Diego Research Compliance and Integrity Office is pleased to offer the Research Compliance Hot Topics and Training Program (Program) to all UC San Diego faculty, staff and students. The Program will offer training through a variety of forums, including workshops, videos, newsletters and other activities, and is designed to serve as an educational resource to assist the UC San Diego research community with the complexities of conducting research. The following sessions have been scheduled:

- ▶ **Town Hall Meeting with the UC San Diego Human Research Protections Program (HRPP)**  
January 30, 2019, 12:30 – 2:00 p.m.,  
ACTRI Auditorium
- ▶ **Conflict of Interest (COI): Navigating COI, the Disclosure Forms and Conflict of Commitment**  
February 27, 2019, 12:30 – 2:00 p.m.  
Leichtag, Room 107

Information on registration and additional sessions will be provided soon.  
For questions, please contact [rci@ucsd.edu](mailto:rci@ucsd.edu).

## RESEARCH ETHICS: SHOULD PEER REVIEW BE OPEN?

BY MICHAEL KALICHMAN



Anyone in academia is likely familiar with the phrase “publish or perish”, and typically the gold standard for publishing is to do so in a peer review setting. The premise is that the best judges of the quality of a paper, grant, or career path are peers who will best know the particular challenges faced by their peers. However, one additional element of this process is that reviewers are in most cases anonymous to those being reviewed and that the research community tends to see only the final product (e.g., the publication), not the reviews themselves. There is a strong case to be made that reviewer anonymity frees the reviewer to give a fully honest assessment, not tempered by the fear that the person being reviewed will perhaps find an opportunity to retaliate in response to a negative review. On the other hand, peer reviewers have been known to hide behind their anonymity to attack or take advantage of those they are reviewing. Any conversation to resolve different perspectives is limited if not completely absent. However, even without considering the pros and cons of unblinding reviewer identities, it might be argued that the scientific community would benefit from seeing the dialogue between authors and reviewers rather than only the final publication.

With these challenges in mind, some stakeholders in research publication have been discussing the possibility of open peer review. Further, open peer review is already on the table for some journals (e.g., EMBO and e-Life). Models include an option for reviewers to collaboratively work together in generating a single review of a manuscript, allowing for the timeline and comments from reviewers and authors to be made public, and/or publicly revealing reviewer identities. Which approaches might be in the best long-term interest of academia remain an open question. With that in mind, one of the major publishers (Elsevier) recently conducted an experiment with open peer review as an option. Tentative findings include the discovery that few reviewers were comfortable revealing their identities, but most of those involved were strongly supportive of open publication of peer review reports. For additional information, please see an [interview](#) recently conducted with one of the leads on this study.

For assistance with ethical challenges intrinsic to the conduct of science, engineering, and other academic scholarship, please contact the [UC San Diego Research Ethics Program](#).

## Ask the Questions . . .

**I have a financial interest in an outside company; can they sponsor my research project at UC San Diego?**

**Answer:** Yes, but financial interest(s) must be disclosed using the proper form(s), and the Independent Review Committee (IRC) must review the disclosure to determine whether the interest(s) constitute significant conflicts of interest that must be eliminated, reduced, or managed before research support can be accepted..

For more information, please contact the Conflict of Interest Office at [info-coi@ucsd.edu](mailto:info-coi@ucsd.edu) or (858) 534-6465.

“Education is the most powerful weapon which you can use to change the world.”

—Nelson Mandela

**For what animal species must I submit an Animal Use Protocol?**

**Answer:** You need to submit an animal use protocol if you are conducting research, training or testing using a vertebrate animal. PHS Policy defines an animal as “any live, vertebrate animal used or intended for use in research, research training, experimentation, or biological testing, or for related purposes.” The Animal Welfare Act Regulations (AWAR) define an animal as “any live or dead dog, cat, nonhuman primate, guinea pig, hamster, rabbit, or any other warm-blooded animal, which is being used or is intended for use for research, teaching, testing, experimentation, or exhibition purposes, or as a pet. This term excludes birds, and rats and mice bred for use in research.” The IACUC ensures the campus is in compliance with applicable regulations by applying the AWAR and PHS regulations to all vertebrate animal use on campus for teaching and research.

If you have a question about your particular research or circumstances, please contact the IACUC Office at [iacuc@ucsd.edu](mailto:iacuc@ucsd.edu) or (858) 534-6069.

**For our international activity, I am required to perform Restricted Party Screening. If there is a match or a “hit”, am I required to notify someone? Can I still move forward with the transaction after notification?**

**Answer:** If you are responsible for running Restricted Party Screening for the various international transactions you are involved with and there is a match or “hit” to the name of the individual, the entity or a sanctioned country such as Cuba, Iran, North Korea, Syria or Sudan, pause (stop) the transaction and escalate the hit to the Export Control Office at [export@ucsd.edu](mailto:export@ucsd.edu). The Export Control Office will review the details of the transaction(s) and advise on the next steps, i.e. if a license is required, a technology control plan or an alternative transaction is required based on the specific regulations. Failure to pause a transaction with restricted individuals, entities or sanctioned countries and escalate those for review may place UC San Diego at risk for fines and/or loss of research funding if a transaction occurs with restricted individuals, entities or countries that are not properly licensed by the U.S. Government.

If you have questions on Restricted Party Screening or on a match, please contact the Export Control Office at [export@ucsd.edu](mailto:export@ucsd.edu) or (858) 246-3300.

### RESEARCH COMPLIANCE AND INTEGRITY

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### HOTLINE - UCSD CONFIDENTIAL TOLL FREE HOTLINE (877) 319-0265

A confidential service to handle reports of potential fraud, waste, misuse of assets or other compliance issues

