September 21, 2012

To: Jose Wudka, Chair
   Riverside Division

Fr: Len Nunney, Chair
    Research

Re: Draft Policy on International Activities

The Committee on Research had an on-line discussion of the draft policy, and it was very clear that there were two issues of significant concern.

**International Activity.** First and foremost is the lack of clarity in the most critical definition of the whole document, the definition of “International Activity”. The current definition does not exclude anything, and so (potentially) includes everything that involves UC faculty when they are outside of the US.

The policy should not cover, and hence the definition should exclude:

- Individual research activity carried out internationally (e.g. field, library and museum work)
- The participation of individuals in international meetings, workshops, and courses; and the participation of individual researchers in organizing these kinds of activities.

**Propaganda.** A second area of serious concern was the regulation A2 “International Activities shall not promulgate propaganda, attempt to influence legislation, or participate or intervene in any political campaign.” At first sight, this may appear reasonable, but it needs to be much more carefully worded. Sadly, one person’s academic pursuit can be another person’s propaganda. For example, how would this regulation affect an international operation studying climate change if that operation undertakes public outreach on how to reduce emissions? Or what about UC researchers overseas writing op-ed pieces, or being interviewed by the media? Both of these kinds of circumstance could result in claims of politicking, and yet should be considered part of academic activity. This is not to imply that there are no boundaries, only that the regulation as written is overly simplistic and consequently overly restrictive.
Other issues that should also be considered are:

**On-line activity.** A relevant issue not raised concerns on-line activity. The document ignores the reality that national boundaries are largely broken down by on-line offerings. How does the policy mesh with this reality?

**Multi-campus oversight.** It is not clear which Chancellor will have oversight if more than one UC campus is involved.

In summary, there are two very important areas of concern for COR: (1) what is NOT an International Activity with respect to this policy? And (2) what public activities can UC faculty participate in when they are outside of the US without being vulnerable under the policy to accusations of propagandizing?