Office of Inspector General
Review of Foreign Influence

Report # C-2526DOE-009 **June 2026**

Executive Summary

In accordance with the Department of Education's fiscal year (FY) 2025–2026 audit plan, the Office of Inspector General (OIG) conducted a review of foreign gifts and foreign gift agreements reported by institutions of higher education (IHEs) to the State Board of Education. Section 1010.25, Florida Statutes (F.S.), requires the Inspector General of the Department of Education (DOE) to annually inspect or audit at least five percent of the total number of foreign-source gifts disclosed by, or gift agreements received from, IHEs during the previous year.

The purpose of this audit was to determine the level of compliance with statutory reporting requirements related to foreign gifts and gift agreements reported during the 2024–2025 disclosure period. The audit included an assessment of both timeliness of reporting and completeness of required documentation.

Overall, 13 institutions reported a total of 227 foreign gifts with a combined value of $101,921,870.02. Our review determined that six of the thirteen IHEs that filed at least one gift disclosure during the review period submitted their disclosures in a timely manner. We identified six institutions that did not report certain gifts within the statutory deadlines based on the dates the IHEs received the gifts. One IHE was excluded from review because its reported gift did not meet the statutory reporting threshold.

We reviewed a sample of thirteen gift disclosures submitted by twelve IHEs with qualifying gift submissions. Six disclosures fully complied with statutory requirements at the time of initial submission, six disclosures did not fully comply due to missing or incomplete gift agreement documentation, and one sampled disclosure was later determined to be non-reportable. Of the six non-compliant disclosures, four IHEs subsequently provided sufficient documentation to achieve full compliance, while two remained partially compliant because they did not submit a gift agreement that met all statutory requirements. These findings are further detailed in the Audit Results section of this report.

Scope, Objectives, and Methodology

The scope of our review included foreign gifts and foreign gift agreements reported by institutions of higher education (IHEs) for the January 31, 2025, and July 31, 2025, reporting periods.

The objective of this engagement was to determine whether IHEs complied with the statutory reporting requirements outlined in Section 1010.25, Florida Statutes (F.S.), including both the timeliness of foreign gift disclosures and the completeness of required documentation. The engagement included a review of all foreign gift disclosures submitted during the reporting period to assess compliance with statutory reporting deadlines, as well as a review of at least five percent of the total number of foreign gifts and foreign gift agreements to evaluate compliance with documentation requirements.

To accomplish our objectives, we reviewed applicable laws, rules, and regulations; interviewed appropriate staff; and examined foreign gift disclosures and related supporting documentation submitted to the State Board of Education and the Commission for Independent Education.

The methodology of our review included:

1. Reviewing all foreign gift disclosures submitted by institutions of higher education to determine whether the disclosures were reported in accordance with the timeliness requirements of Section 1010.25(2), F.S.; and
2. Selecting a sample of at least five percent of reported foreign gifts to determine whether disclosures complied with the documentation requirements of Section 1010.25(3), F.S., including verification that the following information was reported:
   a) The amount of the gift and the date the gift was received.
   b) The contract start and end dates if the gift is a contract.
   c) The name of the foreign source and, if the source is not a foreign government, the country of citizenship (if known) and the country of the foreign source's principal residence or domicile.
   d) A copy of the gift agreement between the foreign source and the institution of higher education, which must:
      i. Be signed by the foreign source and the institution's chief administrative officer, or their respective designees,
      ii. Include a detailed description of the purpose for which the gift will be used by the institution,
      iii. Identify the persons for whom the gift is explicitly intended to benefit; and
      iv. Disclose any conditions, requirements, restrictions, or terms made a part of the gift regarding the control of curricula, faculty, student admissions, student fees, or contingencies placed upon the institution of higher education to take a specific public position or to award an honorary degree.

Background

The Florida Legislature passed House Bill 7017, related to foreign influence, during the 2021 Legislative Session. The act requires increased disclosure of foreign support for public entities; examination of vendors and grant applicants with foreign connections; and review of foreign applicants for research positions, travel to foreign countries, and activities of employees working within research institutions. All provisions of House Bill 7017 became effective July 1, 2021.

This report relates specifically to Section 1010.25, Florida Statutes (F.S.), and includes foreign gift disclosures reported by Florida College System (FCS) institutions, independent nonprofit colleges and universities located in and chartered by the state that grant baccalaureate or higher degrees, and other institutions with a physical presence in Florida that are required to report foreign gifts or contracts under federal law. Beginning July 1, 2022, Section 1010.25(3)(d)2., F.S., requires the Inspector General of the Department of Education (DOE) to annually inspect or audit at least five percent of the total number of foreign gifts disclosed by, or gift agreements received from, these institutions during the previous fiscal year.

Section 1010.25, F.S., requires reporting institutions to disclose information related to the source, value, timing, purpose, and any conditions or restrictions associated with foreign gifts. The statute defines:

- "Gift" as any contract, gift, grant, endowment, award, or donation of money or property of any kind, including conditional or unconditional pledges; and
- "Contract" as any agreement for the acquisition by purchase, lease, or barter of property or services from a foreign source for the direct benefit or use of either party, including transactions involving a foreign country of concern as defined in Section 286.101(1)(b), F.S.

Institutions of higher education are required to report qualifying foreign gifts on a semiannual basis. Gifts received between July 1 and December 31 must be reported by January 31 of the following year, and gifts received between January 1 and June 30 must be reported by July 31 of the same year. To facilitate compliance, the Division of Florida Colleges developed and distributed the Foreign Gift & Donation Disclosure Form along with reporting instructions outlining required submission elements.

Of the reporting institutions, two of the twenty-eight Florida College System (FCS) institutions, eight of the thirty Independent Colleges and Universities of Florida (ICUF) institutions, and three Commission for Independent Education (CIE) institutions reported foreign gift disclosures (Indian River State College and Valencia College; Beacon College, Eckerd College, Embry-Riddle Aeronautical University, Florida Institute of Technology, Nova Southeastern University, Stetson University, University of Miami, and University of Tampa; and Babson College, Northeastern University, and UNAD Florida, respectively).

Reported foreign gifts included contracts for goods and services, clinical research trials, awards, pledges, and student sponsorships.

Institution of Higher Education	Number of Gifts Disclosed	Combined Value of Gifts
Babson College	11	$4,411,805.37
Beacon College	1	$150,000.00
Eckerd College	1	$189,890.52
Embry-Riddle Aeronautical University	11	$1,245,297.16
Florida Institute of Technology[1]	16	$6,091,806.34

[1] One gift disclosed by Florida Institute of Technology included a $29,229.38 payment received in June 2024.

Indian River State College[2]	1	$5,000.00
Northeastern University	12	$6,126,008.04
Nova Southeastern University	61	$6,720,186.23
Stetson University	1	$285,143.00
UNAD Florida	1	$75,000.00
University of Miami	103	$76,165,237.56
University of Tampa	6	$203,121.00
Valencia College	2	$253,374.80
TOTAL[3]:	**227**	**$101,921,870.02**

Gifts from Foreign Countries of Concern

Section 286.101(1)(b), F.S., defines a foreign country of concern as "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 Nicolás Maduro, or the Syrian Arab Republic, including any agency of or any other entity under significant control of such foreign country of concern."

Of the 227 foreign gift disclosures reported by institutions of higher education (IHEs) for fiscal year 2024–2025, we identified fifteen gifts originating from foreign countries of concern, all associated with the University of Miami. Fourteen of these gifts originated from entities associated with the People's Republic of China, with a combined value of $30,394,630.20, while one gift originated from an individual in Venezuela, totaling $1,418,400.20.

The gifts originating from China consisted primarily of sponsored clinical research agreements that established payment amounts based on enrollment or per-procedure costs rather than fixed award totals. The Venezuelan gift supported age-related macular degeneration research at the University of Miami's Bascom Palmer Eye Institute.

Audit Results

Timeliness Requirement

We reviewed all 227 foreign gift disclosures to determine whether the disclosures were reported in compliance with Section 1010.25(2), Florida Statutes, which requires institutions of higher education (IHEs) to submit semiannual reports to the State Board of Education listing all foreign-source gifts received directly or indirectly with a value of $50,000 or more. Gifts received between July 1 and December 31 must be reported by January 31, and gifts received between January 1 and June 30 must be reported by July 31. If a foreign source provides more than one gift to an IHE in a fiscal year and the cumulative value equals or exceeds $50,000, all such gifts must be reported.

[2] Indian River State College reported one foreign gift; however, because the $5,000 amount fell below the $50,000 statutory reporting threshold, it was excluded from the sample and not subject to further testing.
[3] Totals include submissions later determined to be below the statutory reporting threshold or otherwise nonreportable.

Overall, most gift disclosures complied with the statutory reporting deadlines; however, six of the thirteen institutions submitted at least one disclosure after the applicable deadline. In total, IHEs reported 24 of the 227 disclosures after the statutory deadlines, primarily due to omissions from original submissions, misinterpretation of reporting requirements, and weaknesses in internal processes. Except for the disclosures outlined below, IHEs reported foreign gifts in accordance with Section 1010.25(2), F.S.

Babson College reported five qualifying foreign gifts for the July–December 2024 reporting period in its subsequent July 2025 disclosure rather than the January 2025 disclosure as required in statute. Each disclosure was submitted 181 days late. The institution attributed the delay to a transition in compliance personnel during the reporting period.

Embry-Riddle Aeronautical University (ERAU) submitted timely original disclosures for both reporting periods but subsequently filed amended reports identifying an additional qualifying foreign gift that had been omitted from the original submissions. ERAU disclosed payments received under an agreement with SENAT – Serviço Nacional de Aprendizagem do Transporte (Brazil) well after the statutory deadlines. They attributed the late disclosures, including one reported 217 days after the deadline and another reported 398 days after the deadline, to administrative oversight. Because the disclosures related to payments under a single agreement, they were treated as one instance of noncompliance.

Northeastern University reported seven qualifying foreign gifts received during the July–December 2024 reporting period in its subsequent July 2025 disclosure, resulting in delays of 181 days for each disclosure.

Nova Southeastern University (NSU) submitted its disclosures timely for the July–December 2024 reporting period; however, it omitted one qualifying foreign pledge payment received during that period. The omitted gift, valued at $50,000, was later reported in the July 2025 disclosure, resulting in a delay of 181 days beyond the deadline. NSU attributed the omission to oversight during the internal compilation of reportable items.

UNAD Florida Inc. reported one qualifying foreign gift received on December 9, 2024, in its July 2025 submission, exceeding the statutory deadline. The institution indicated that it relied on guidance from the Commission for Independent Education that differed from statutory requirements; however, the institution had already missed the statutory deadline prior to CIE issuing any guidance.

The University of Miami (UM) reported nine qualifying foreign gifts after the applicable deadlines across both reporting periods, with delays ranging from 183 to 1,277 days. Several of these late disclosures were identified through enhanced internal review processes after the reporting periods had closed. Despite subsequent corrections, the timing of these disclosures resulted in multiple instances of noncompliance.

The University of Tampa submitted its initial disclosures without identifying the dates that they received the gifts. During the audit, the institution provided amended disclosures that included the missing receipt dates. Based on the additional information obtained, we determined that the University of Tampa reported all gifts within the statutory timeframes.

Information Requirements
Section 1010.25(3)(a)–(c), Florida Statutes, requires reporting IHEs to provide the amount of the foreign gift and the date it was received; the contract start and end dates if the gift is a contract; and the name of the foreign source and, if not a foreign government, the country of citizenship, if known, and the country of principal residence or domicile of the foreign source.
Section 1010.25(3)(d), F.S., further requires IHEs to include a copy of a gift agreement between the foreign source and the institution of higher education that is signed by both parties and includes a detailed description of the purpose of the gift, the identification of intended beneficiaries, and any applicable conditions, requirements, restrictions, or terms associated with the gift.

We reviewed 13 of the 227 (5.73%) foreign gifts and associated gift agreements to determine whether the submissions complied with applicable statutory requirements. To ensure appropriate institutional coverage, the sample included at least one qualifying item from each reporting institution, where available. Indian River State College was excluded from selection because its sole reported gift ($5,000) did not meet the statutory reporting threshold. Additionally, two items were selected from the University of Miami due to its higher volume of disclosures. Of the thirteen items included in the sample, six were fully compliant at the time of initial submission.

Our review of the remaining disclosures identified deficiencies related to missing or incomplete documentation. These deficiencies included failure to submit a gift agreement with the initial disclosure, absence of required signatures from the foreign source or institutional designee, incomplete identification of beneficiaries, or omission of required reporting elements such as the date the gift was received.

Specifically:

- Babson College and Northeastern University did not include a copy of the required gift agreement with their initial disclosures. Although Northeastern University later provided gift agreement documentation in response to a request from the Commission for Independent Education, this documentation was submitted after the initial disclosure and did not contain the required signatures;
- Embry-Riddle Aeronautical University's gift agreement lacked both required signatures and did not clearly identify the beneficiary of the gift;
- UNAD Florida's gift agreement and one University of Miami submission included only one of the required signatures; and
- University of Tampa's submission did not include the date the gift was received.

During the review, the OIG contacted the institutions with deficiencies and requested additional documentation to assess compliance with statutory requirements. As a result of this effort:

- Babson College provided a fully executed gift agreement and achieved full compliance;
- UNAD Florida and the University of Miami submitted revised agreements with all required signatures and achieved full compliance; and

- University of Tampa amended its disclosure to include the required receipt dates and achieved full compliance.

However, Embry-Riddle Aeronautical University and Northeastern University submissions remained partially compliant, as the institutions could not provide a fully executed gift agreement signed by both parties that met all statutory requirements.

Overall, six of the thirteen sampled disclosures were not fully compliant at the time of initial submission. Of these, the applicable IHEs corrected four disclosures during the audit, while two remained partially compliant due to the absence of properly executed gift agreements. The IHEs generally attributed the partial compliance to reliance on alternative forms of documentation or differing interpretations of statutory requirements in instances where formal agreements had not been executed.

The table below shows the breakdown of compliance by IHE.

Name of IHE	Gifts Reviewed	Fully Compliant Initial Submission	Fully Compliant Ultimate Submission
Babson College	1	No	Yes
Beacon College	1	Yes	Yes
Eckerd College	1	Yes	Yes
Embry-Riddle Aeronautical University	1	No	No
Florida Institute of Technology	1	Yes	Yes
Northeastern University	1	No	No
Nova Southeastern University	1	N/A[4]	N/A
Stetson University	1	Yes	Yes
UNAD Florida Inc.	1	No	Yes
University of Miami	1	Yes	Yes
University of Miami	1	No	Yes
University of Tampa	1	No	Yes
Valencia College	1	Yes	Yes

Management Responses

Two of the twelve institutions represented in the compliance table provided a response to the report. Please see attached management response letters from Embry-Riddle Aeronautical University (Attachment A) and the University of Miami (Attachment B). Embry-Riddle Aeronautical University acknowledged that administrative oversight contributed to the late disclosure of a foreign gift and outlined corrective actions to strengthen reporting controls and

[4] Nova Southeastern University reported the sampled submission as a gift; however, subsequent to our fieldwork, the university provided additional explanation indicating that the submission was a parent paying their child's tuition and associated fees. Accordingly, it was determined to be a non-reportable submission.

ensure timely disclosures. ERAU also explained that a reviewed gift was supported by donor correspondence rather than a formal gift agreement, clarified that the beneficiary was Embry-Riddle Aeronautical University, Inc., and indicated that it is implementing corrective actions to strengthen reporting controls and ensure future compliance.

The University of Miami acknowledged that they did not report the nine late disclosures identified in the report within the statutory timeframes and attributed the delays to corrections of prior-period disclosures and enhanced internal review procedures. UM also provided additional context regarding gifts from foreign countries of concern and explained that the questioned documentation consisted of financial guarantee and support letters rather than traditional gift agreements. The university stated that it will modify its procedures to obtain institutional signatures on such documentation in the future.

Closing Comments

The Office of Inspector General would like to recognize and acknowledge the offices and staff of the Florida College System, the Commission for Independent Education, and the institutions for their assistance during this review. Our fieldwork was facilitated by the cooperation and assistance extended by all personnel involved.

To promote accountability, integrity, and efficiency in state government, the OIG completes audits and reviews of agency programs, activities, and functions. Our audit was conducted under the authority of Section 20.055, F.S., and in accordance with the General Principles and Standards for Offices of Inspector General, published by the Association of Inspectors General. The audit was conducted by Kieran Compagnone and supervised by Bradley Rich, Audit Director.

Please address inquiries regarding this report to the OIG's Audit Director by telephone at 850-245-0403. Copies of final reports may be viewed and downloaded via the internet at https://www.fldoe.org/about-us/office-of- the-inspector-general/audit-reporting-products.stml. Copies may also be requested by telephone at 850-245- 0403, by fax at 850-245-9419, and in person or by mail at the Department of Education, Office of the Inspector General, 325 West Gaines Street, Suite 1201, Tallahassee, FL 32399.

EMBRY-RIDDLE
Aeronautical University
Office of the Executive Vice President and Chief Financial Officer Randall B. Howard, Ph.D.

Attachment # A

June 10, 2026

Mr. J. Bradley Rich
Audit Director
Office of Inspector General
325 West Gaines Street, Suite 1201
Tallahassee, Florida 32399

Dear Mr. Rich:

Re: Report # C-2526DOE-009 Review of Foreign Influence

The University has reviewed the findings contained in the report and confirms their accuracy.

Finding 1 - Late Disclosure of Foreign Gift
The University acknowledges that payments received under an agreement with SENAT – Serviço Nacional de Aprendizagem do Transporte (Brazil) were not reported within the statutory timeframes required under Section 1010.25, Florida Statutes.

Management's review determined that the delayed reporting resulted from an administrative oversight at the University's Central & South America campus (Embry-Riddle Brasil Educação Aeronáutica Ltda., São Paulo, Brazil). At the time of the reporting lapse, key personnel responsible for financial and administrative functions subsequently separated from the University. In addition, the campus operated with limited administrative staffing, which contributed to a delay in the reporting process.

The University takes compliance with statutory reporting requirements seriously and has implemented, or is in the process of implementing, several corrective actions designed to strengthen internal controls and prevent recurrence, including:

- Assigning additional resources at the University's Daytona Beach campus to support foreign gift reporting oversight and compliance activities.
- Implementing an automated business process for the collection, review, and approval of foreign gifts and contracts information to enhance internal controls and support timely reporting.
- Implementing Workday Finance at the Central & South America campus effective July 1, 2027, which will centralize customer accounts and invoicing processes and improve visibility and oversight.

- Enhancing Workday customer invoicing templates to identify foreign gifts and contracts at the point of invoicing. This enhancement will be implemented first at U.S. campuses, followed by Embry-Riddle Asia and Embry-Riddle Europe, and subsequently at Embry-Riddle Central & South America following its Workday implementation.

<u>Finding 2 – Gift Documentation and Beneficiary Identification</u>
The University acknowledges the finding that submitted documentation did not include a formal gift agreement signed by both parties and that the original disclosure did not clearly identify the beneficiary of the gift.

The gift in question ($5,000) was secured through direct donor communications and was supported by email correspondence documenting donor intent and authorization. While a formal written gift agreement was not executed, the University maintained contemporaneous records evidencing the donor's approval and the purpose of the gift.

The University confirms that the beneficiary of the gift was Embry-Riddle Aeronautical University, Inc. The gift supported the University's Alumni Homecoming activities, which promote engagement among alumni, students, faculty, and the broader University community.

To strengthen future reporting and documentation practices, the University will enhance its review procedures to ensure that supporting documentation accompanying reportable foreign gift disclosures clearly identifies the donor, beneficiary, purpose of the gift, and any required evidence of donor authorization. The University will also provide additional guidance to personnel involved in the foreign gift reporting process to promote consistency and completeness in future submissions.

The University is committed to full compliance with Section 1010.25, Florida Statutes, and appreciates the opportunity to address these matters. Management takes the findings seriously and is implementing process improvements designed to strengthen oversight, enhance reporting accuracy, and ensure timely and complete disclosures going forward.

Sincerely,

Randall B. Howard

Randall B. Howard, Ph.D.
Executive Vice President and CFO

Attachment # B

University of Miami Response to FL Department of Education Office of the Inspector General -2026 Audit of Foreign Gifts and Agreements Reported by Institutions of Higher Education
6/22/2026

Gifts from Foreign Countries of Concern

Response:

It should be noted that the gifts from China were from Chinese companies and the gift from Venezuela was from a Venezuelan national. None of these gifts were from governmental entities.

Timeliness Requirements

Response:

The 9 foreign gifts that were not reported in a timely manner were corrections for items from previous years which should have been reported during those time periods.

The seven items that were reported by the University's Office of Research Administration (ORA) were subsequently identified as being subsidiaries of companies with U.S. names and addresses. University Compliance Services utilized AI to identify foreign parentage, which was a tool not available until recently. We reported them in the 7/31/2025 submissions as "corrections." This was done due to enhanced review processes and out of an abundance of transparency in reporting. As such, we feel that we were not in compliance with the timeliness of reporting as a technical matter.

There were two items reported by University Advancement that were not previously reported Advancement did not report any donations by this entity for the July 31, 2024 submission although the gifts were received on 6/4/2024 but reported the gifts for the January 31, 2025 submission

The amounts were reported to the FL DoE for the 1/31/2025 submission as a correction since the amounts should have been reported in the 7/31/2024 submission.

Information Requirements

Response:

With regards to the gift agreement, the Financial Guarantee and Support Letter for a scholarship to cover tuition costs for a student is not a contract nor a gift per se. As a university, when we receive tuition payments, whether domestic or international, our Student Financial Aid Office does not enter into any type of contract with the student or the entity granting the scholarship to the student to pay for tuition and costs, as such the letters do not contain a signature from anyone at the University. This was confirmed by our Student Financial Aid Office. However, going forward we will be having a respective designee from the Financial Aid Office sign off on the letters.