



September 1, 2020

Mike Miller, Deputy Assistant Secretary
Bureau of Political-Military Affairs
c/o United States Department of State
2401 E. Street, N.W.
Washington, DC 20037
Via email at millermf@state.gov

CC: Jae Shin, Director of Compliance
Office of Defense Trade Controls Compliance
Via email at shinJE@state.gov

Re: *GAO-20-394-Export Controls: State and Commerce Should Improve Guidance and Outreach to Address University-Specific Compliance Issues*

Dear Mr. Miller,

The Association of University Export Control Officers (AUECO) respectfully submits this letter in response to *GAO-20-394-Export Controls: State and Commerce Should Improve Guidance and Outreach to Address University-Specific Compliance Issues*.

AUECO, formed in 2008 with 17 individuals representing 17 institutions of higher education, has since grown to include membership of over 339 export control professionals with compliance responsibilities at 202 institutions of higher education within the United States. AUECO is committed to monitoring guidance and changes in the administration of export control laws and regulations that may affect the unique nature of higher education and academia.

We appreciate the GAO's report on university specific export compliance issues and its findings. We are happy to see their guidance directed at universities and value the acknowledgement from GAO that export control compliance within the academic environment is uniquely complex. In line with the GAO recommendation to DDTC to include information concerning periodic risk assessments specific to universities in their guidance, we recommend that a consolidated risk assessment tool inclusive of the key regulations, developed for universities be considered, as a consolidated tool would be most beneficial to our members.

University specific export control issues are directly referenced in the 2020 GAO letter, just as they were in the 2006 letter. Both letters specifically requested that the State Department do more to support

universities. While there have undoubtedly been improvements, both letters speak to the need to tailor export control guidance to universities. AUECO can support DDTC through providing consultation with university representatives who are well versed in the unique challenges universities face with export controls. Our association can help DDTC gauge what type of guidance universities need most and work as a direct link to university compliance professionals if DDTC has any questions in the process of applying these GAO recommendations. While multiple constituencies within higher education should be contacted and represented in this process, such as the Association of American Universities (AAU), the Association of Public and Land-grant Universities (APLU), and the Council on Governmental Relations (COGR), only AUECO is able to offer access to university export control professionals specifically. Additionally, we can provide unique insights into what the GAO report captures in its findings.

While we typically hold an annual conference, unsurprisingly the 2020 conference has been postponed. DDTC representatives have attended our conferences in the past and we encourage DDTC to send representatives in the future. Their representatives have always been active and contributing attendees at our conferences and we are sure they would continue to add beneficial government insight at future conferences. As we try to provide our membership virtual content to keep current on the various regulations, we welcome DDTC's participation in those efforts.

In summary, AUECO agrees with the GAO report and its recommendations for the U.S. Department of State and DDTC. AUECO has been integral to supporting government agencies responsible for monitoring university export control compliance in the past and are willing to continue that engagement in the future. AUECO would welcome the opportunity to partner with DDTC in creating a university specific risk assessment tool and disseminating any changes out to the academic community. We are actively reaching out to the GAO, Commerce, and Defense to offer our collaboration and support on changes to training and policy guidance for academic institutions. AUECO would gladly support DDTC as well.

AUECO appreciates the opportunity to provide the State Department with the above comments related to this report and will be glad to provide further comments if it would be helpful.

Respectfully,

DocuSigned by:

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David Ivey

Chair

Association of University Export Control Officers

Website: <http://aueco.org>