



August 25, 2020

Kimberly Gianopoulos, Director, International Affairs and Trade
c/o Government Accountability Office
441 G St., NW
Washington, DC 20548
Via email at gianopoulosk@gao.gov

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

Dear Ms. Gianopoulos:

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 was formed in 2008 with 17 individuals representing 17 institutions of higher education. Since then, AUECO has grown to include membership of 339 export control professionals with compliance responsibilities at 202 institutions of higher education within the United States. AUECO is committed to monitoring changes in the administration of export control laws and regulations that may affect the unique nature of higher education and academia. We provide our members with a forum for exchanging information, ideas, and lessons learned regarding compliance with U.S. export, import and trade sanctions laws and regulations. Additionally, we have been active in providing comments on proposed changes to federal export control regulations, especially when the changes uniquely affect universities.

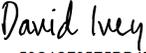
The association and many of its members contributed to the study and we welcomed the report and its recommendations. We were happy to see the guidance directed at universities and value the acknowledgement from GAO that export control compliance within the academic environment is uniquely complex. The study, however, did not address the breadth of regulatory compliance that universities often face. In addition to compliance with the International Traffic in Arms Regulations (ITAR) and the Export Administration Regulations (EAR), universities must also be aware of and ensure compliance with several other export control regulations (e.g., nuclear technology and material regulations overseen by the Department of Energy and the Nuclear Regulatory Commission, the sanction programs overseen by the Office of Foreign Assets Control and U.S. Customs and Border Protection regulations). We suggest that

future studies consider more broadly the breadth of regulatory compliance facing universities. In line with the GAO recommendation to DDTC to include information concerning periodic risk assessments in their guidance, we recommend that a consolidated risk assessment tool inclusive of the key regulations, developed for universities be considered.

As part of the association's goal of advocacy, we will be reaching out to the Department of Commerce (Bureau of Industry and Security), Department of State (Directorate of Defense Trade Controls) and the Department of Defense (Office of the Undersecretary of Defense for Research and Engineering) to offer our assistance in implementing GAO's recommendations to each. We believe our membership is uniquely positioned to provide input in this area.

AUECO appreciates the opportunity to provide the Government Accountability Office 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>