



UNIVERSITY OF WISCONSIN - MADISON

EXPORT CONTROL

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2019 Conference Survey Results

San Diego, CA conference

Compiled by Bethany Nelson of the University of Wisconsin-Madison

Previous survey results can be found at:

<https://research.wisc.edu/integrity-and-other-requirements/export-control/additional-information/>

80 surveys were returned. 79 were from Universities, Scientific Institutions, and University Medical Centers.

1 result was not from a University or Scientific Institution and was not counted.

2 schools submitted 2 surveys each. Only one was counted from each of these schools.

This gave a total of 77 discrete surveys answered.

This is an increase from 75 from 2018, and 67 from 2017.

2 survey takers did not seem to realize that there was a back side and so some questions will only have 75 responses. The percentages for these answers are based off of 75 instead of 77.

Broad Observations:

Screening numbers, for the most part are up, but there are some fluctuations. This may be attributed to the fact that more schools are taking the survey, increasing the overall data pool and that different schools may be adding themselves to the pool of respondents from year to year.

H1-B visas, grants and outgoing foreign MTA screenings seem to be hitting a saturation point with 94%-97% of schools screening these categories at least some of the time.

Fs and O-1s have also seen increases, but in a sharp change from last year, there was slight increase in J screenings, though it still holds at 79% of schools screening.

There are also some small shifts in a few areas in which screening all of the time decreased while screening some of the time increased, potentially indicating shift in risk tolerance.

The new question regarding online courses shows that a large percentage of schools offer them with less than a quarter doing sanctioned country screenings.

Mandatory training continues to rise, and schools are continuing to develop a large variety of processes across the board.

Schools have a pretty wide distribution of the number of staff who handle export controls with 1/3 concentrated on 1 FTE.

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Here are the total screenings and percentages (rounded to the nearest whole number).

Visas

77 responses

Type	# of Universities who screen	Percentage	Change from 2018	Change from 2017	Change from 2016
H-1B	73	94%	0%	+9%	+5%
O-1	46	60%	+9%	+18%	+15%
J	61	79%	-2%	+10%	+17%
F	37	48%	+10%	+3%	+26%
Other	11	14%	0%	+2%	+4%

Other specified as: B, H4, TN

Type	# of Universities who screen all the time	Change from 2018 / 2017	# of Universities who screen some of the time*	Change from 2018 / 2017
H-1B	57 (74%)	-2% / +7%	16 (21%)	+3% / +3%
O-1	31 (40%)	-2% / +15%	15 (19%)	+9% / +1%
J	35 (45%)	-6% / +3%	26 (34%)	+5% / +7%
F	10 (13%)	-6% / +3%	27 (35%)	+17% / +1%

*includes Universities that did not indicate if they screen some or all of the time

Additional Information:

- 1 person indicated that they screen F graduate students only (this is reflected as them screening some)
- 1 respondent said that they screen a few J-2s
- 1 school screens H1-Bs that are accepted on sponsored research
- 1 school screens Fs working on research
- 1 school screens all employees
- 1 school screens any non-students
- A few respondents indicate that they screen J1s and not other Js. This question was supposed to reflect J1s and will be edited next year to reflect that.

Counted in other category:

- 1 screens EADs
- 1 personnel on TCPs

Not reflected in numbers:

- 1 respondent said that they think the international office may screen Fs



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Student Screenings

77 responses

Type	# who screen	percentage	Change from 2018	Change from 2017	Change from 2016
Undergrad US	25	32%	+7%	+10%	+7%
Graduate US	30	39%	+7%	+12%	+32%
Post-doc US	31	40%	+9%	+18%	+33%
Undergrad International	39	51%	+5%	+17%	+39%
Graduate International	60	78%	+11%	+11%	+42%
Post-doc International	65	84%	+17%	+23%	+33%

Type	# of Universities who screen all the time	Change from 2018 / 2017	# of Universities who screen some of the time*	Change from 2018 / 2017
Undergrad US	3 (4%)	-2% / -2%	22 (29%)	+10% / +13%
Graduate US	3 (4%)	-6% / -2%	27 (35%)	+13% / +14%
Post-doc US	6 (8%)	No change / +4%	25 (32%)	+10% / +14%
Undergrad International	7 (9%)	-4% / -1%	32 (42%)	+9% / +18%
Graduate International	13 (17%)	-8% / -1%	47 (61%)	+19% / +22%
Post-doc International	23 (30%)	+1% / +6%	42 (55%)	+15% / +18%

*includes Universities that did not indicate if they screen some or all of the time

Additional Information:

- 1 school screens all employees, including those classified as students
- 1 school screens students when they are involved in export controlled projects or TCP projects
- 1 screens students only if there is a TCP
- 1 screens students if they are employees on a grant or in high risk centers/institutes
- 1 screens undergrads and US citizens only when they are proposed to work on restricted research
- 1 screens foreign students only when working on sponsored projects
- 1 screens all students when they are involved in an NDA or TCP
- 1 screens anyone on a TCP



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1 screens graduate and post-grad foreign students only when they are working on an export controlled projects

1 screens all parties on a TCP and all parties connected to research

1 screens graduate international students if they are not registered students at the University

Additional information not reflected in the above numbers:

1 screens students through the University's visa screening, but not when they apply to attend the University

Restricted Party Interactions

Either 68 or 76 answers

8 surveys did not have anything answered for this question. It is unclear if that means they don't allow any of this or declined to answer the question (as happened last year). This choice will be added next year.

Percentages are provided for both scenarios.

Type	# of schools who allow	Percentage based on 76 answers	Change from 2018	Percentage based on 68 answers	Change from 2018
Travel to Restricted Parties	26	34%	+4%	38%	+7%
Visitors from Restricted Parties	28	37%	-3%	41%	+1%
Contracts with Restricted Parties	11	14%	+4%	16%	+6%
Students from Restricted Parties	33	43%	+9%	49%	+4%
Have not had this arise and do not have a policy	26	34%	N/A	38%	N/A
Other	4	5%	N/A	6%	N/A
Indicated do not allow any	1	1%	N/A	1%	N/A

Additional information:

5 indicated a case by case determination

1 allows visitors and students with control plans

1 school who indicated they do not have a policy said their general response would be no, but exceptions could be made under special circumstances

1 indicated that they would allow visitors and students for fundamental research only



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- 1 allows visitors and students but meets with the host to provide guidance
- 1 allows travel to restricted parties but advises against it
- 1 does not have a policy but states that a review would have to be done
- 1 says that graduates of restricted party are allowed as long as there is no further connection
- 1 allows these activities, but that doesn't mean the export control person likes it

Not reflected in numbers:

- 1 school had a note next to this question, but it was unclear and did not explain what their policy was
- 1 did not check anything but indicate it depends on the restricted party

MTAs

77 responses

Type	# of schools who screen	Percentage	Change from 2018	Change from 2017	Change from 2016
Incoming Domestic MTAs	34	44%	+5%	+8%	+12%
Outgoing Domestic MTAs	38	49%	+7%	+4%	+13%
Incoming Foreign MTAs	59	77%	+8%	+11%	+13%
Outgoing Foreign MTAs	72	94%	+6%	+18%	+13%

Type	# of Universities who screen all the time	Change from 2018 / 2017	# of Universities who screen some of the time*	Change from 2018 / 2017
Incoming domestic MTAs	14 (18%)	No change / +2%	20 (25%)	+4% / +6%
Outgoing domestic MTAs	20 (26%)	+4% / +7%	18 (23%)	+4% / -2%
Incoming foreign MTAs	40 (52%)	+6% / +9%	19 (25%)	+3% / +3%
Outgoing foreign MTAs	53 (69%)	-2% / +13%	19 (25%)	+8% / +6%

*includes Universities that did not indicate if they screen some or all of the time

Additional information:

- 1 school indicated that they will screen incoming MTAs only if they have export control clauses in them
- 1 school indicated that they screen domestic MTAs only for export controlled projects



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1 school indicated that they screen outgoing MTAs to foreign entities only for chemical, biological, radioactive, and export controlled materials

1 screens MTAs only when export control is found

1 indicated that the research office screens all entities that the school contracts with

1 is supposed to screen outgoing, foreign MTAs, but doesn't really see any indicating a process issues

Grants and other contracts

77 responses

Type	# of schools who screen	percentage	Change from 2018	Change from 2017	Change from 2016
Grants	75	97%	+3%	+10%	+13%
Fee For Service(FFS)	48	62%	+5%	+8%	+17%
NDA's	70	91%	+2%	+13%	+18%

Type	# of Universities who screen all the time	Change from 2018 / 2017	# of Universities who screen some of the time*	Change from 2018 / 2017
Grants	27 (35%)	-11% / -1%	48 (62%)	+13% / +11%
Fee For Service(FFS)	18 (23%)	-1% / +5%	30 (39%)	+6% / +3%
NDA's	31 (40%)	+4% / +12%	39 (51%)	-2% / +2%

*includes Universities that did not indicate if they screen some or all of the time

Additional information:

2 screens agreements involving foreign parties

1 school screens all DOD/military funded contracts

1 school screens agreements that come through the central research administration, but some other areas have signature authority which may not get screened

Not reflected in numbers:

1 school did not indicate that they screen any of these agreements, but said they screen sub awardees



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Purchases

75 responses

Type	# of schools who screen	percentage	Change from 2018	Change from 2017	Change from 2016
By the University from domestic sources	39	52%	+5%	+12%	+18%
By the University from foreign sources	61	81%	+5%	+20%	+22%
From the University by domestic sources	28	37%	+11%	+7%	+15%
From the University by foreign sources	44	59%	+6%	+10%	+25%

Type	# of Universities who screen all the time	Change from 2018 / 2017	# of Universities who screen some of the time*	Change from 2018 / 2017
By the University from domestic sources	11 (15%)	-4% / +3%	28 (37%)	+9% / +9%
By the University from foreign sources	25 (33%)	+1% / +11%	36 (48%)	+4% / +9%
From the University by domestic sources	9 (12%)	-2% / +2%	19 (25%)	+12% / +6%
From the University by foreign sources	21 (28%)	+4% / +9%	23 (30%)	+1% / no change

*includes Universities that did not indicate if they screen some or all of the time

Additional Information:

2 school screens vendors, not specific purchasers

1 screens purchases over \$5000

1 school says this is handled by the overall state system in a centralized fashion



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1 screens purchases when they know about them

1 screens all purchases for restricted parties

Time Screened

Type	# who screen
Screen purchases before	28
Screen purchases after	2
Mixture of both	33
Don't Screen	6
No indication	2
Don't Know	1
Other	3

Travel

The question regarding domestic travel was removed as it involved such a small percentage of Universities.

75 responses

Type	# of schools who screen	percentage	Change from 2018	Change from 2017	Change from 2016
Foreign Travel	68	91%	-6%	-2%	+20%

Type	# of Universities who screen all the time	Change from 2018 / 2017	# of Universities who screen some of the time*	Change from 2018 / 2017
Foreign Travel	21 (28%)	-8% / +7%	47 (63%)	+2% / -9%

*includes Universities that did not indicate if they screen some or all of the time

Additional information:

2 schools screen travel depending on destination country

2 screens travel to embargoed or sanctioned countries

1 is implementing new software to help see international travel

1 screens if goes through university system



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Shipments

The question regarding domestic shipments was removed as it involved such a small percentage of Universities.

75 responses

Type	# of schools who screen	percentage	Change from 2018	Change from 2017	Change from 2016
Foreign shipments	65	87%	+5%	+12%	+36%

Type	# of Universities who screen all the time	Change from 2018 / 2017	# of Universities who screen some of the time*	Change from 2018 / 2017
Foreign shipments	20 (27%)	+5% / +15%	45 (60%)	No change / -3%

*includes Universities that did not indicate if they screen some or all of the time

Additional information:

1 school trained the shipping department to identify any foreign package for review by the Export Control Office

Visitors

72 responses

Type	# of schools who screen	percentage	Change from 2018	Change from 2017	Change from 2016
Conference visitors	40	53%	+7%	+16%	+33%
Regular campus visitors	48	64%	No change	+12%	+32%

Type	# of Universities who screen all the time	Change from 2018 / 2017	# of Universities who screen some of the time*	Change from 2018 / 2017
Conference Visitors	2 (3%)	-5% / -4%	38 (51%)	+13% / +21%
Regular Visitors	5 (7%)	-4% / -2%	43 (57%)	+4% / +14%

*includes Universities that did not indicate if they screen some or all of the time

Additional information:

- 1 school screens all College of Engineering visitors
- 1 screens international visitors
- 1 screens all visitors at a branch campus
- 1 screens foreign conference visitors
- 1 screens all known visitors but in future looks to screen all visitors
- 1 has procedures set up for high risk areas and buildings
- 1 will start screening soon

Online Courses

75 responses

Type	# of Universities	Percentage
Offers online courses	64	85%
Does not offer online courses	11	15%

Sanctioned screenings of online courses

Calculations based on the 64 schools that offer online courses.

Type	# of Universities	Percentage
Screen online course participants for sanctioned country students	15	23%
Do no screen online course participants for sanctioned country students	41	64%
No indication	5	8%
Policy is unknown	2	3%
In discussion	1	2%

Additional information:

- 1 school did not indicate if they did or did not offer online courses but did indicate that they perform sanctioned country screenings
- 1 school didn't know if they screened for sanctioned countries
- 1 school answered that they did not screen for sanctioned countries but noted that some screening is done by other university offices
- 1 University who does not screen participants noted that their courses are only public domain information
- 1 University does not allow registration from sanctioned countries



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Mandatory Training

75 responses

Type	# of Universities	Percentage	Change from 2018	Change from 2017
Mandatory Training	57	76%	+13%	+15%
No Mandatory Training	18	24%	-9%	-15%

Some schools indicated the specific areas of mandatory training as follows:

36 schools require training for TCP participants

2 schools train anyone collaborating with person or entity on Restricted Party lists

2 schools train anyone working on projects with export controlled subject matter

1 school each trains the following:

in-person training for participants of classified research

all engineering staff and faculty once every 3 years

researchers in engineering and science

staff in high risk areas

classified areas

key departments

risky visas

certain funded projects

certain research projects

all University employees every 2 years

all research professors, staff, post grads and some under grads have training once a year

faculty

all employees annually

researchers on research projects

anyone on export controlled projects

all visiting scholar hosts

H1-b and J1 sponsors

certain admin offices

employees every 2 years

faculty every 3 years

EHS shipments

CUI and TCPs when security is put in place

high risk labs/centers

anyone who supervises foreign nation employees

all branch campuses

research admin



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all new PIs

Schools that do not have mandatory training indicated the following:

1 school is developing training that will be required for all researchers

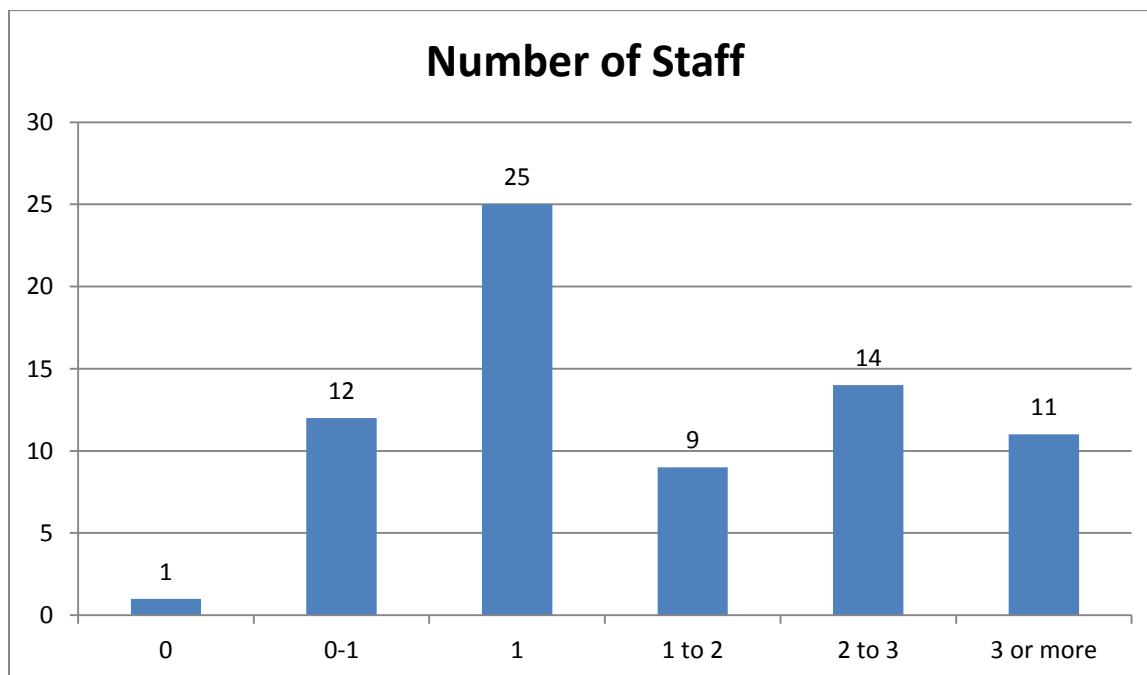
1 does targeted training

1 case by case basis

Number of Export Control Staff

75 responses

Amount of Export Control Staff	# of Universities	Percentage
0	1	1%
Greater than 0, Less than 1	12	16%
1	25	33%
Greater than 1 to less than 2	9	12%
2 to less than 3	14	19%
3 or more	11	15%
Nothing indicated/unclear	3	4%



1 school filled out the survey, but answered 0 to this question without explanation. It may be that someone is handling export control without a title and with other duties, but that is speculation.

When sorting responses by these groups, we can see some trends.



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The more staff, the more likely there will be at least some sort of mandatory training with 100% of Universities with 3 or more staff indicating they have mandatory training.

No schools with less than 1 staff person also do classified work, and less than half of each group of less than 3 persons takes classified while over 80% of schools with 3 or more people take classified research.

More staff also means more likely to screen in most, but not necessarily all areas. The group of schools with 3 or more staff members has, by far, the highest screening percentages across the board, but there are fluctuations across the rest of the groups. Sometimes the schools with less than 1 staff member will have a higher screening rate than schools with larger staff amounts.

Additional information:

3 schools in the 3 or more category noted they were in the process of adding an additional staff

1 school has half of the staff they had from 3 years ago

1 school in the 2-3 category covers other areas of compliance in addition to export controls

1 school is in the process of liaising with administrative offices and forming an advisory task force to help share duties

Developing Processes

37 Schools indicated that they were developing processes in a variety of areas. Some schools listed more than one process in development

The following processes are listed as in development:

6 foreign travel

3 foreign shipments

3 H1-B visas

3 J visas

3 MTAs

3 online courses

3 purchases

3 visitors

2 all of the above

2 did not specify anything, just that they were developing processes

2 visas

2 visiting scholars

1 Shipping

1 travel

1 use visual compliance

1 only if we get additional resources



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- 1 trying to develop in spare time
- 1 anything in which we are not screening everyone, we are developing processes
- 1 expanded NDA screening
- 1 online training
- 1 students in online courses
- 1 working with restricted party entities
- 1 screening more shipments
- 1 assessing visa process
- 1 F-1 students from sanctioned countries
- 1 international students
- 1 education, training and awareness
- 1 distance education
- 1 adding export control language to all agreements so the other party will need to notify the school in advance of export control issues
- 1 NDAs
- 1 training stake holders to complete screenings in-house
- 1 screenings of all risk areas
- 1 foreign visitors
- 1 in discussion about what is needed
- 1 revising screening program
- 1 procurement
- 1 finance & admin
- 1 moving toward comprehensive screening
- 1 F visas in high risk research areas
- 1 students that work on export controlled research
- 1 continuing education
- 1 training

Classified Research Acceptance

75 responses

Accepts classified	26	35%
Does not accept classified	48	64%
Not recently	1	1%

Breaking down the numbers as Universities who accept classified research vs. those that don't
Percentages were based on that category total only(i.e classified was based on 26 total etc.).

	Accepts classified-26 total	Does not accept classified-48 total
H-1B	25 (96%)	45 (94%)



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O-1	17 (65%)	29 (60%)
J	21 (81%)	38 (79%)
F	14 (54%)	21 (44%)
Other	6 (23%)	4 (8%)
Undergrad US	10 (38%)	15 (31%)
Grad US	13 (50%)	17 (35%)
Post-doc US	13 (50%)	18 (38%)
Undergrad International	17 (65%)	22 (46%)
Grad International	22 (85%)	37 (77%)
Post-doc International	24 (92%)	39 (81%)
Allow travel to Restricted Parties	9 (35%)	17 (35%)
Allow Visitors from Restricted Parties	11 (42%)	17 (35%)
Allow contracts with restricted parties	4 (15%)	7 (15%)
Allow students from restricted parties	13 (50%)	20 (42%)
Incoming Domestic MTAs	10 (38%)	22 (46%)
Outgoing Domestic MTAs	13 (50%)	23 (48%)
Incoming Foreign MTAs	20 (77%)	36 (75%)
Outgoing Foreign MTAs	24 (92%)	45 (94%)
Grants	25 (96%)	47 (98%)
FFS	17 (65%)	28 (58%)
NDA	24 (92%)	43 (90%)
Purchases by the University from Domestic sources	13 (50%)	25 (52%)
Purchases by the University from Foreign sources	22 (85%)	38 (79%)
Purchases from the University by Domestic sources	10 (38%)	17 (35%)
Purchases from the University by Foreign sources	20 (77%)	23 (48%)
Foreign Travel	23 (88%)	44(92%)
Foreign shipments	24 (92%)	41 (85%)
Conference visitors	17 (65%)	23 (48%)
Regular visitors	18 (69%)	30 (63%)
Mandatory Training	21 (81%)	36 (75%)



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Other comments:

1 school was curious about screening for the different types of F visas

1 school is curious if any institutions have RPS watch lists for entities/individuals outside of Huawei that the school is monitoring for potential changes

1 school screens anyone taught by faculty outside the US

1 school noted that bubbler is a weird word; the survey's compiler will not disagree

1 school asked about the possibility of starting an AUECO journal

Several comments were made about how this survey has helped schools which is much appreciated feedback.