



UNIVERSITY OF WISCONSIN - MADISON

EXPORT CONTROL

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2023 Screening Survey Results

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/>

71 surveys were returned with no schools submitting twice.

Thank you to everyone who answered.

Please note: The survey was not sent out in 2022 so comparisons are to years before that.

Broad Observations:

Screenings seem to be decreasing slightly overall. However, areas that might be considered higher risk in a category are seeing an uptick so this may be a shifting of resources based on risk and priorities.

Restricted party interactions are more restricted, and lack of a policy is decreasing as well.

Screening continues to increase for online course participants.

There is a decrease in schools that have 1 or fewer export control FTEs, but an increase in those that have more than that.

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

Visas

Type	# of Universities who screen	Percentage	Change from 2021	Change from 2020	Change from 2019
H-1B	64	90%	-6%	-4%	-4%
O-1	45	63%	+6%	-1%	+3%
J	60	85%	-1%	-2%	+6%
F	37	52%	-4%	+3%	+4%
Other	12	17%	-16%	-14%	+3%

Type	# of Universities who screen all the time	Change from 2021 / 2020	# of Universities who screen some of the time	Change from 2021 / 2020
H-1B	52 (73%)	-4% / -11%	12 (17%)	-2% / +7 %
O-1	29 (41%)	+5% / -3%	16 (23%)	+2% / +2%
J	38 (54%)	no change / +3%	22 (31%)	No change / -4%
F	12 (17%)	+3% / +4%	25 (35%)	-6% / no change

Other: TN, B-1, B-2, E-3, F



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Additional Information:

Generally don't know which kind of visa the person has.

Screen J-1 scholars, not students

Fs only for TCPs

Foreign grad students on a TCP

Visitors on campus policy requires hosts to share info about upcoming visits by internal folks

Pretty sure not aware of all visa holders on campus

Student Screenings

Type	# who screen	percentage	Change from 2021	Change from 2020	Change from 2019
Undergrad US	25	35%	-4%	-5%	+3%
Graduate US	27	38%	-8%	-10%	-1%
Post-doc US	28	39%	-7%	-10%	-1%
Undergrad International	34	48%	-6%	-4%	-3%
Graduate International	57	80%	-1%	-2%	+2%
Post-doc International	59	83%	-1%	-2%	-1%

Type	# of Universities who screen all the time	Change from 2021/2020	# of Universities who screen some of the time	Change from 2021 / 2020
Undergrad US	3 (4%)	-3% / -2%	22 (31%)	No change / -3%
Graduate US	3 (4%)	-3% / -4%	24 (34%)	-5% / -5%
Post-doc US	5 (7%)	No change / -4%	23 (32%)	-7% / -6%
Undergrad International	8 (11%)	-7% / -4%	26 (37%)	-2% / -8%
Graduate International	14 (20%)	-9% / no change	43 (61%)	+8% / -1%
Post-doc International	25 (35%)	-9% / +2%	34 (48%)	+8% / -5%

Additional Information:

5 If on TCP/restricted project

3 Screen if working on a controlled project

Screen persons based on project requirements



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International post-docs are screened if we sponsor their visa

International visitors who are not on a visa sponsored by the university

Screen international students in online programs

Accessing CUI

Signing NDA

State law requires if connection with state-defined country of concern and person is doing research

All grad students for international campuses

All faculty, staff, and students are screened

Based on field of study/proximity to restricted research

All J1s and H1bs

Any foreign national working on grant funding that may include restrictions

If working on sensitive research project

Requesting access to graduate level topics from a country of concern for a topic of concern

HR performs some screening

Restricted Party Interactions

Type	# of schools who allow	Percentage	Change from 2021	Change from 2020	Change from 2019
Travel to Restricted Parties	16	23%	-4%	-3%	-11%
Visitors from Restricted Parties	19	27%	No change	No change	-10%
Contracts with Restricted Parties	10	14%	-3%	-1%	No change
Students from Restricted Parties	17	24%	-13%	-12%	-19%
Do not have a policy	11	15%	-11%	-13%	N/A
Has not come up	8	11%	-5%	-4%	N/A
No policy but discuss as situations arise	34	48%			N/A
Evaluate on a case by case basis	53	75%			N/A
Do not allow any	5	7%	-18%	-11%	+2%

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Other	1	1%			
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Additional information:

2 The situation has not come up for several years

Travel, visitors and students affiliated with RPS lists must follow compliance protocols to be approved

Generally not allowed

Would allow students who have graduated

Per our high-risk/restricted party policy, senior leadership plus Legal have agreed to accept the risks

Form that department needs to fill out to certify they understand the risks

MTAs

Type	# of schools who screen	Percentage	Change from 2021	Change from 2020	Change from 2019
Incoming Domestic MTAs	28	39%	-14%	-7%	-5%
Outgoing Domestic MTAs	32	45%	-12%	-7%	-4%
Incoming Foreign MTAs	52	73%	-11%	-7%	-4%
Outgoing Foreign MTAs	67	94%	No change	+9%	No change

Type	# of Universities who screen all the time	Change from 2021 / 2020	# of Universities who screen some of the time	Change from 2021 / 2020
Incoming domestic MTAs	10 (14%)	-5% / no change	18 (25%)	-9% / -3%
Outgoing domestic MTAs	12 (17%)	-4% / -5%	20 (28%)	-8% / -1%
Incoming foreign MTAs	37 (52%)	-11% / -7%	15 (21%)	No change / -1%
Outgoing foreign MTAs	49 (69%)	-15% / -3%	18 (25%)	+15% / +10%

Additional information:

Export Control is usually informed when there is an export clause

Review domestic if there is EC language

Only when there is a question on a foreign collaborator

EC team is small and supports 3 different campuses. Review what we can but also have boilerplate language for contracting people to include automatically

Grants and other contracts

Type	# of schools who screen	percentage	Change from 2021	Change from 2020	Change from 2019
Grants	63	89%	-6%	No change	-8%
Fee For Service(FFS)	39	55%	-18%	-16%	-7%
NDA's	61	86%	-1%	-4%	-5%
Other	13	18%	-6%	N/A	N/A

Type	# of Universities who screen all the time	Change from 2021 / 2020	# of Universities who screen some of the time	Change from 2021 / 2020
Grants	18 (25%)	-1% / -15%	45 (63%)	-7% / +14%
Fee For Service(FFS)	5 (7%)	-7% / -20%	34 (48%)	-11% / -4%
NDA's	18 (25%)	-2% / -6%	43 (61%)	-3% / +10%
Other	9 (13%)	+4% / N/A	4 (6%)	-10% / N/A

Additional information:

Flagged by the reviewer when there is a foreign sponsor or performance site in a country of concern.

All outgoing subawards to foreign organizations are reviewed.

Ask faculty a series of questions at time of proposal, then review the contract at time of award.

All government contracts

Any contract flagged

Based on sponsor activity and terms.

Sponsored projects escalate any grants, NDAs with export control language

Depends on the campus

Those that involve foreign collaborators or companies

Grants are not awarded yet, and our man hours do not provide us the luxury of screening them for potential issues

Purchases

The wording of this question has been changed from previous years for clarity. As this is the first year this question has been phrased this way, there is not comparison date.

Type	#of schools who screen	percentage
Domestic Vendors	36	51%
Foreign Vendors	53	75%
Domestic Purchases	34	48%
Foreign Purchases	54	76%



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p-card transactions	20	28%
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Type	#of Universities who screen all the time	# of Universities who screen some of the time
Domestic Vendors	16 (23%)	20 (28%)
Foreign Vendors	33 (46%)	20 (28%)
Domestic Purchases	13 (18%)	21 (30%)
Foreign Purchases	27 (38%)	27 (38%)
p-card transactions	3 (4%)	17 (24%)

Time Screened

Type	# who screen
Screen purchases before	27
Screen purchases after	0
Mixture of both	31
Don't Screen	6

Additional Information:

2 Screened by procurement

RP list screen when new vendor is initiated in system (foreign and domestic)

Most are not screened

Should be before, sometimes after

As flagged

SOP says before, but really a mixture

IT security purchases

Screening is dependent upon departments/purchasing contacting EC after the fact

Purchases that go through central purchasing are screened

New software so anticipate types of reviews will dramatically increase over the next 6 months

Most purchases are not screened due to man hours and lack of policy

Travel

Type	# of schools who screen	percentage	Change from 2021	Change from 2020	Change from 2019
Foreign Travel	67	94%	+3%	-3%	-3%

Type	# of Universities	Change from 2021 / 2020	# of Universities who screen some of the time	Change from 2021 / 2020

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	who screen all the time			
Foreign Travel	25 (35%)	-4% / -4%	42 (59%)	+5% / +5%

Additional information:

Work in progress, new legislation in state that requires foreign travel be screened and approved
 Worker to get greater visibility and optimistic that adopting Workday will include a notification
 Countries of concern
 Updating review process
 Travel that is not booked/disclosed is not screened

Shipments

Type	# of schools who screen	percentage	Change from 2021	Change from 2020	Change from 2019
Foreign shipments	61	86%	-3%	+7%	-1%

Type	# of Universities who screen all the time	Change from 2020 / 2019	# of Universities who screen some of the time	Change from 2020 / 2019
Foreign shipments	15 (21%)	-8% / -13%	46 (65%)	+5% / +20

Additional information:

2 Working with eship global toward all shipments
 Used to screen all foreign shipments, but becoming burdensome for shipping department
 Foreign shipments if we know
 Looking into shipping platform
 No centralized shipping

Visitors

Type	# of schools who screen	percentage	Change from 2021	Change from 2020	Change from 2019
Conference visitors	35	49%	-4%	-6%	-4%
Regular campus visitors	49	69%	-5%	+4%	+5%



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Type	# of Universities who screen all the time	Change from 2021 / 2020	# of Universities who screen some of the time	Change from 2021 / 2020
Conference Visitors	3 (4%)	-3% / +3 %	32 (45%)	-1% / -10%
Regular Visitors	8 (11%)	+1% / +5%	41 (58%)	-4% / +1%

Additional information:

4 Those that are reported/requested

2 Foreign conference visitors

2 Visitors are screened if they will be issued an ID card for independent access to campus buildings

This is one of my bigger concerns on campus

Only those coming with a visa we support

Do not screen

Revisiting to address gaps

Depends on access requested

If requiring an email address/resource access or if on a sponsored visa

Review for delegation visitors

Online Courses

Calculations based on 67 respondents to this question

Type	# of Universities	Percentage	Change from 2021	Change from 2020	Change from 2019
Offers online courses	61	91%	-5%	+12%	+6%
Does not offer online courses	6	9%	+5%	+2%	-6%

Sanctioned screenings of online courses

Calculations based on 62 responses to this question

Type	# of Universities	Percentage	Change from 2021	Change from 2020	Change from 2019
Screen online course participants for sanctioned country students	30	48%	+10%	+19%	+25%



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Do not screen online course participants for sanctioned country students	19	31%	+8%	+7%	-33%
Unsure	8	13%	-5%	-10%	N/A
Other	5	8%	-12%	-2%	N/A

Additional information:

Only time screen students is for online courses

Screen only for degrees of concern

Graduate courses only because the Graduate School knows to notify regarding international students

Mandatory Training

Type	# of Universities	Percentage	Change from 2021	Change from 2020	Change from 2019
Mandatory Training	44	62%	-5%	-4%	-14%
No Mandatory Training	27	38%	-1%	+11%	+14%

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

16 TCPs

4 CUI

2 engineering

2 grants

2 research admins

2 contracts

Set up is being discussed

Training offered in person is required for all members of research teams engaging in restricted projects

CITI module

ITAR

Certain labs

All employees/faculty/staff/students

CITI for all doing sponsored research

Unit heads of academic departments

Non academic unit heads as determined by ECO

EC advisory committee members

Deans reviewing annual faculty planning documents

Short orientation and yearly refresher for employees and post docs



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PIs

Purchasing

Bas

FAs

Foundation

Property

Participants in restricted projects

Proposals

Department chairs

Senior leadership

Visual compliance users

COI for PIs

Restricted research PIs

Everyone involved in research has to take a 5-minute online training

Anyone who has to do a COI report has to take export control training

Compliance training for all, EC for those on projects

Online for all students and employees every 2 years

Export license recipients

Foreign host or scholar

FNR managed awards

Export controlled projects

Some H1-b and O-1s

Only require when required by funding sponsor

Discussing potential mandatory training for NSPM-33 implementation

Number of Export Control Staff

69 responses

Amount of Export Control Staff	# of Universities	Percentage	Change from 2021	Change from 2020
Less than .5	9	13%	-8%	-8%
.5-.99	8	11%	-1%	-2%
1	13	18%	-2%	-7%
1.01-1.5	11	15%	+2%	+4%
1.51-1.99	1	1%	-6%	No change
2	17	24%	+14%	+8%
3	6	8%	+4%	No change
More than 3	6	8%	-4%	+3%



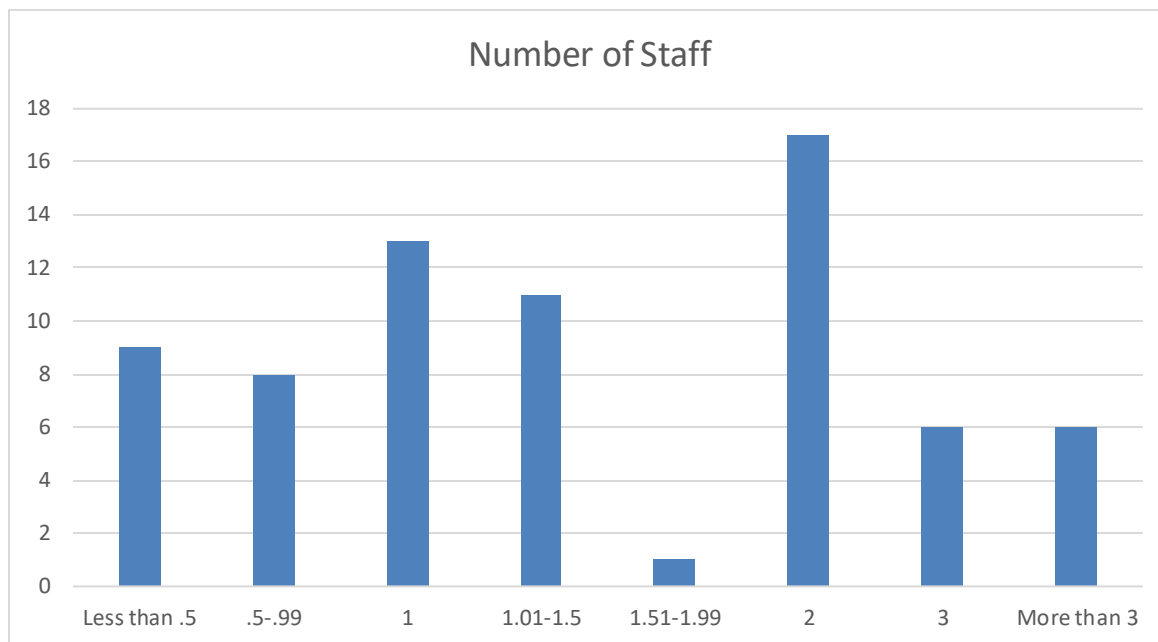
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Developing Processes

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

4 Foreign travel

4 shipments

2 Mandatory trainings

The following processes are listed as in development:

Visitor screenings

Risk based training

Risk based reviews of collaborations/visiting researchers/subawards/contracts

Reporting metrics

General SOP

User guide

Trainings for departments conducting screenings

Trainings-making training mandatory for certain PIs that interact a lot with export controls

Export control manual

Export control

Research security

Revisiting all documented processes to update and improve



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- Enhance end use statement in MTA
- International visitors
- Regular campus visitors
- Employees at international campuses
- Screen for reputation export risks
- Always looking for ways to expand
- Visas
- Streamline process across all colleges
- Centralizing shipping
- Auditing financial transactions
- Automated training of research admins
- Travel and shipping platform
- Screening all faculty
- Online course registration
- Grad/undergrad students
- Will attempt
- Restricted parties
- B visas
- Formal procedures for all of the above
- Screening adjunct faculty
- Sabbatical requests to foreign countries
- Collaborators
- Visiting scholar agreements that highlights IP information
- Screening practices
- Research security training
- More comprehensive export control screening and training
- Who will take which training and why
- Research security process
- All HR apportionments
- Foreign p-card transactions

Classified Research Acceptance

71 responses

Accepts classified	18	25%
Does not accept classified	50	70%
Other	3	4%

Other:

In the process



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Other comments:

It would be nice if someone would present general information to University Presidents that having a qualified export control person on staff is necessary for R1 universities

Backfilling an additional person

State law has caused an enhancement of some of these reviews

Screen all students because they are looking for hands on experience

Need 5-10 people

1 full time EC person and 1 research security person who helps with specific areas of export controls

Standard procedures would be helpful as I am very new at this

Looking to add FTE in next 12-24 months

No export control office, Research Integrity Director handles items