



Report to the Audit and Compliance Committee of the  
UHS Board of Regents on:

UH EXPORT CONTROLS  
AR2022-08

UNIVERSITY of **HOUSTON** SYSTEM

INTERNAL AUDITING DEPARTMENT

# UNIVERSITY OF HOUSTON

## EXPORT CONTROLS AUDIT

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# EXECUTIVE SUMMARY

## Overview and Scope Summary

Export controls are laws and regulations established by United States Federal Government agencies to restrict the export of goods, technology, and information out of the country for reasons of national security or protection of trade. The regulations fall under the following export regulations, categories and agencies:

- Export Administration Regulations (EAR): associated with exporting sensitive items while ensuring that trade can still occur between the US and foreign countries.
- International Traffic in Arms Regulations (ITAR): prohibit the export of sensitive military articles and services.
- Commerce Control List (CCL): category list of items that have both commercial and military applications.
- Office of Foreign Assets Control (OFAC): restricts commerce with certain foreign countries, companies, and individuals.

The scope for this audit was FY18 - FY20 for UH. Additionally, we focused on recommending improvements that will help ensure our ability to properly monitor export controls as well as mitigate risks related to foreign influence and the protection of research data presently and in the future as our research activities continue to grow.

## Observations:

During the audit, the Department of Internal Auditing focused on evaluating the various processes related to managing export controls. Although primarily related to research activity, export controls extend to other common university activities occurring across the university such as international travel, international shipping/receiving, protection of research data, and online courses involving individuals from other countries. We identified the need to develop policies and an education program related to export control matters, enhance controls that monitor research activity, increase awareness of laws and regulations (and associated penalties for non-compliance) and best practices, and automate processes.

## Overall Audit Opinion

There were moderate to significant findings in this report related to the control structure surrounding export control, foreign influence, visiting scholars, and research data protection. These process areas include policies and procedures; education and awareness; international shipping; and international travel.

## Recommendations:

UHS IAD recommends the following actions:

1. Management should evaluate the organizational structure dedicated to managing the export controls process to ensure that proper oversight can occur.
2. Management should enhance its awareness and education program related to export controls, foreign influence, international travel, visiting scholars, and research data security. The awareness program should include, at a minimum, knowledge related to a general overview of export controls laws and regulations, allowable exclusions, penalties for non-compliance, foreign influence or research data security, and how these impact research conducted at UH. The education plan should include, at a minimum, an evaluation of training needs as well as who should be required to take the training and how compliance should be monitored.
3. Management should enhance policies and procedures for export controls, foreign influence, visiting scholars, foreign talent recruitment, research data security, monitoring international travel and shipments from UH, and required training related to the above referenced topics. These policies should define, at a minimum, export control and compliance requirements; UH's position on grant contracts with export control language; notification and/or approvals for visiting scholars; protection of research data, etc.; reviews, approvals, and monitoring of international travel; and reviews, approvals and monitoring of international shipping.
4. Procedures related to export controls, international shipments, international travel, training, visiting scholars, etc. such as reviews, approvals, monitoring, etc. should be automated, as appropriate.
5. Management should reevaluate the control structure for international shipping requests and institute a process that requires DoR approval prior to shipping.
6. Management should implement a control structure to ensure compliance with System Administrative Memorandum 07.A.08 – Data Classification and Protection. This must include, but not be limited to, elements such as training to staff and faculty regarding the requirements of SAM 07.A.08, review of laptops prior to travelling internationally, and/or a “clean laptop” loaner program.

# ANALYSIS OF THE UNIVERSITY OF HOUSTON EXPORT CONTROLS

## INTRODUCTION

The Internal Auditing Department developed an annual audit plan based upon a system-wide risk assessment to identify significant areas of risk facing the System. All the audits on the plan are conducted in accordance with Generally Accepted Government Auditing Standards (GAGAS) and International Standards for the Professional Practice of Internal Audit, published by the Institute of Internal Auditors (IIA).

## BACKGROUND

The Internal Auditing Department (IAD) performed a review of export controls at UH.

The Division of Research (DoR) is responsible for monitoring research activity, corresponding to annual expenditures of approximately \$195 million, to ensure compliance with export controls laws and regulations. One of the three Research Contracts Officers performs all export control responsibilities such as reviewing grant documentation for export control restrictions, providing guidance to faculty and staff, monitoring international travel, assisting in the hiring of foreign faculty researchers and research staff, and evaluating the risks of foreign influence. The Research Contracts Officer is also responsible for other research administration tasks such as assisting with grant proposals and reviewing grant contracts.

While the Research Contracts Officer handles the above mentioned responsibilities, UH primarily relies on self-disclosure by faculty researchers to identify potential export control matters.

## OBJECTIVE AND SCOPE

The primary areas of focus for the Export Controls audit were:

- Compliance with Export Control Laws
- Organizational Structure
- Education and Training
- Grant Execution
- Foreign Influence
- International Travel
- Shipping and Equipment Transfer
- Distance Education

The objective of our analysis was to examine each of these areas for:

- Strength of controls for appropriate risk mitigation of university activities
- Compliance with federal agency export control laws and regulations
- Appropriate organizational resources dedicated to support export controls
- Adequacy of knowledge and awareness of export controls

Information relevant to this audit was obtained through:

- Interviewing export controls and other university personnel
- Reviewing laws, regulations, and other guidance from federal agencies
- Reviewing UH policies and procedures
- Reviewing other public Tier 1 research university websites

- Reviewing research grant documentation maintained at the University
- Data obtained from PeopleSoft Finance and Campus Solutions queries

## Issue 1 – Organizational Structure

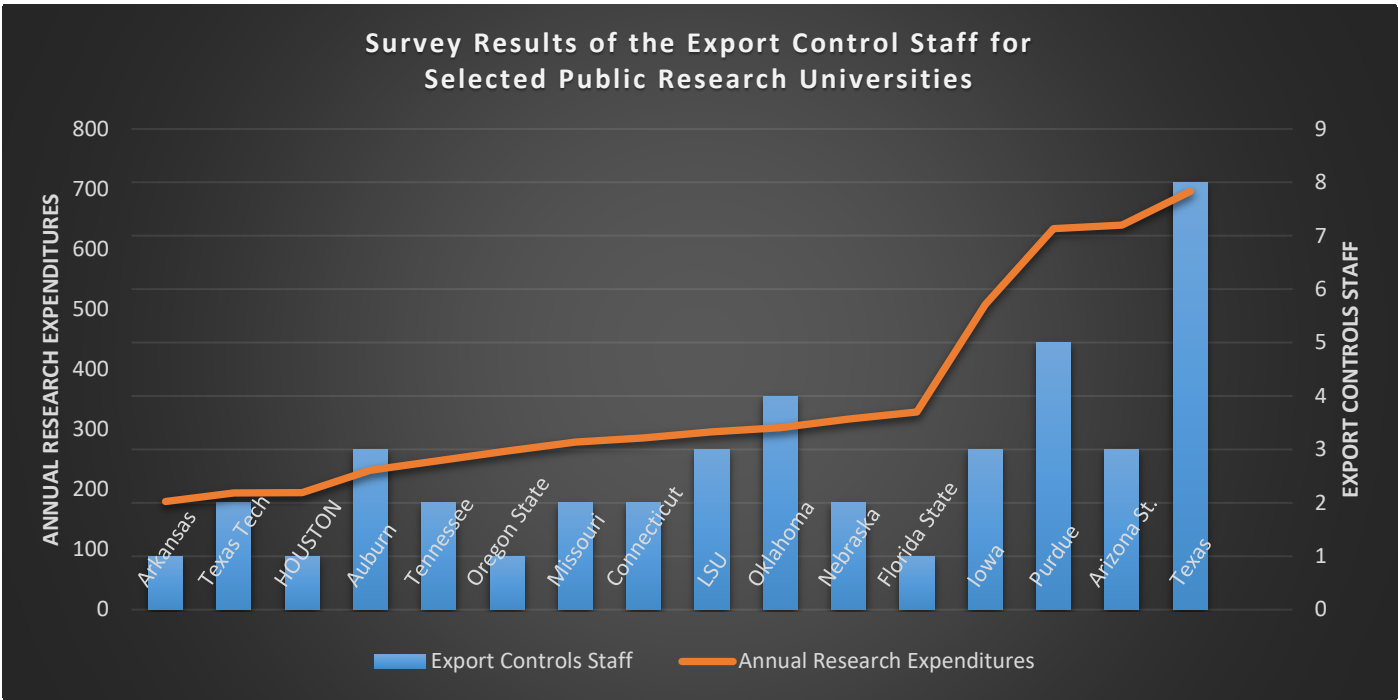
**Objective:** To determine if the organizational structure of staff in DoR is adequate to perform all responsibilities related to export controls.

**Criteria:** Best practices suggest that a university performing research activity on behalf of federal agencies have sufficient resources dedicated to ensuring that processes and controls related to export controls are in place and are properly monitored.

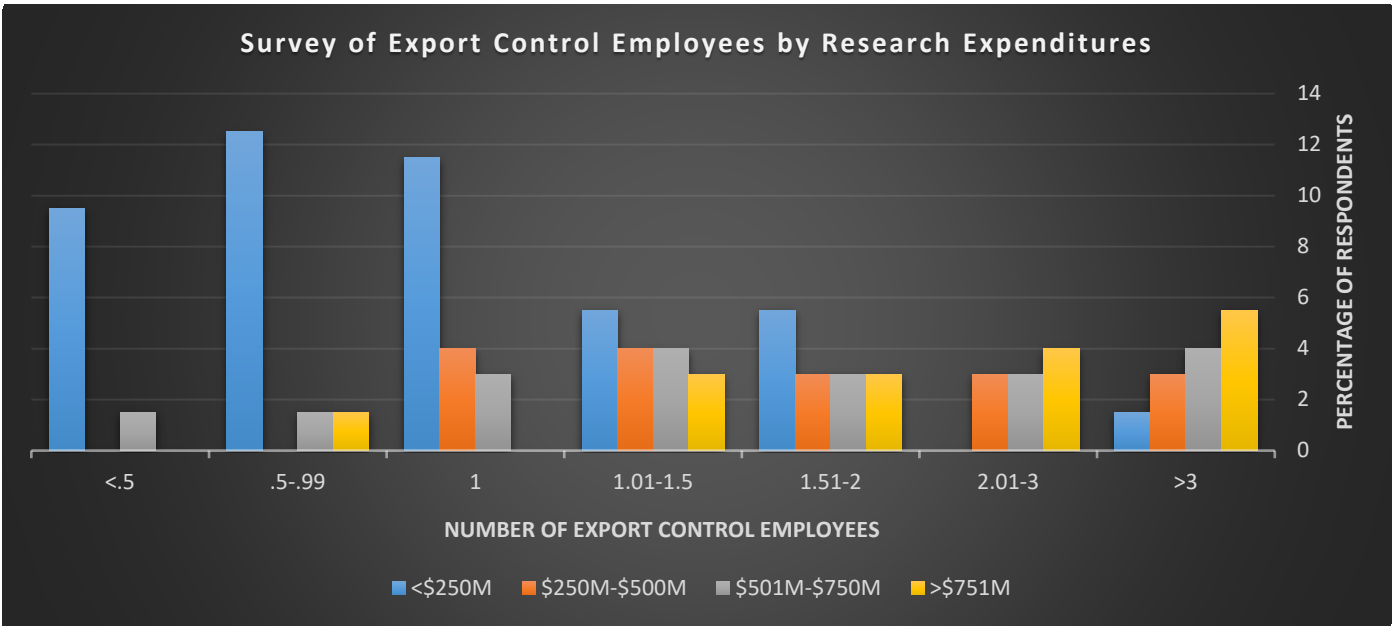
**Risk:** If the University does not allocate resources to ensure an appropriate organizational structure that can establish, update, and monitor processes and controls related to export controls, the University is at risk of violations. Violations can result in fines, penalties, and loss of research reputation.

**Observation:** Through our discussion with management, we determined that UH has one employee performing all export control responsibilities in addition to other research tasks assigned to them. During the planning phase of the audit, we reviewed a report of a study conducted by the Government Accountability Office (GAO) released in May 2020 which noted that expectations of compliance with laws and regulations are increasing, putting greater strain on universities to adhere. Annual research expenditures at UH have grown from approximately \$96 million in FY 2010 to \$160 million in FY 2020 without any additional staffing resources dedicated to monitoring export controls. Additionally, UH’s “50-in-5” program strives for an expansion in research expenditures from \$195 million in FY 2019 to approximately \$270 million in FY 2024.

We conducted a survey of 15 public Tier 1 research universities with annual research expenditures ranging from approximately \$180 million to \$700 million, with an emphasis on universities with \$200 million to \$300 million in research expenditures, according to a 2019 National Science Foundation research expenditure report. For the selected universities, we obtained the number of Division of Research employees that perform export control tasks on a regular basis and compared the numbers to the organizational structure at UH. A graph of the survey is attached below.



In addition, we obtained a graph of the results from a survey conducted by the Association of University Export Control Officers (AUECO) in March 2020. The AUECO is an association of 231 institutions in the U.S. focused on sharing information and best practices related to export Controls. The graph below illustrates the FTE dedicated toward export controls for institutions with varying ranges of annual research expenditures.



The results of the surveys indicated that UH is currently allocating fewer resources to its export controls compliance area than most other universities included in the survey, based on similar research expenditures. The

employee performing export controls tasks is also responsible for reviewing a portion of grant contracts for DoR, while most other universities have dedicated staff for export controls responsibilities.

**Conclusion:** There is an opportunity for UH to evaluate its organizational structure and resources dedicated to establishing, enhancing, and monitoring policies, procedures, and research activity subject to export controls and related requirements as UH strives toward its goal to expand its research expenditures from \$195 million in FY 2019 to approximately \$270 million in FY 2024 in accordance with its “50-in-5” program.

## Issue 2 – Awareness and Education

**Objective:** To determine if UH has developed an adequate education plan to train faculty researchers on export controls laws and regulations and if management and faculty maintain an appropriate awareness when conducting research and sharing results with the international scientific community.

**Criteria:** Best business practices suggest that faculty researchers must be knowledgeable of compliance expectations and aware of when they need to consult with DoR for additional guidance.

**Risk:** Inadequately trained faculty and staff are prone to unknowingly commit violations which exposes the university and faculty researcher to fines and penalties and may result in loss of research funding, loss of research data, and a damaged reputation.

**Observation:** The DoR website contains a comprehensive arrangement of export controls information, guidance, and Frequently Asked Questions on its Compliance page. There are a number of links that take the website visitor to additional links that are relevant to faculty researchers, however, the website is difficult to navigate because the links do not stand out on the webpage and require the visitor to click multiple links before finding certain information.

For international travel to embargoed countries, DoR informs the faculty researchers that they are required to complete an education course offered by the Collaborative Institutional Training Initiative (CITI Program) operated by the University of Miami, which provides web-based training on a number of research topics including research ethics and export controls compliance. Although the export controls compliance office issues an email providing guidance to each international traveler and requires the completion of the CITI training, the traveler can still proceed with the trip without successfully completing the training, there are no consequences for incomplete training, and university funds can still be used to cover the cost of the trip.

UH does not offer any other online or in-person training program and does not provide references to external training materials such as FBI videos or courses offered by the governmental agencies regulating export controls.

We requested the training records for five employees that traveled internationally that were required to complete the CITI export control training modules. Two employees who traveled to Iran in 2016 did not complete the required training.

We reviewed the websites of 15 peer institutions (some of which were included in the annual research expenditure and employee survey above) to obtain information on their training programs, determine whether training was mandatory or optional, and the frequency of training needed to be completed. The results of our review are contained in the chart below.

Institution of Higher Education	University Developed Online or In-Person Training Program	CITI Training Program	Mandatory	Frequency of Completion
Arizona State University	X			As Needed
Auburn University		X		As Needed
Georgia Institute of Technology	X		X	Annual
Purdue University	X	X		As Needed
Texas A&M University	X		X	Every 2 Years
Texas Tech University		X		As Needed
University of Arizona	X		X	Every 2 Years
University of Arkansas	X			As Needed
University of California - Berkeley		X		As Needed
University of Colorado	X		X	Upon Employment
UNIVERSITY OF HOUSTON		X		As Needed
University of Iowa	X			As Needed
University of Minnesota		X	X	Prior to Research
University of Nebraska	X	X	X	Prior to Research
University of Texas	X			As Needed

**Conclusion:** There is an opportunity for UH to improve management and faculty awareness of export controls laws, regulations, risks and best practices through expanding and enhancing its export controls and other training program requirements related to export controls, foreign influence and research data protection. Additionally, there are opportunities for UH to evaluate the structure and design of the export controls webpage to make it easier to navigate and locate information.

## Issue 3 – Policies and Procedures

**Objective:** To determine if UH has policies and procedures in place that are consistent with Federal Government laws and regulations and provide adequate controls and oversight to identify and monitor research activities with export control requirements, possible foreign influence, visiting scholars, and protection of research data..

**Criteria:** Regulations established by the Federal Government protect U.S. security and research interests through restricting certain items and information from being exported to certain foreign countries. In addition, best practices call for restricting the sharing of information with sanctioned countries and individuals associated with the government of those countries.

**Risk:** If UH does not operate according to export controls policies and procedures that are consistent with laws and regulations, it is at risk of violations possibly resulting in penalties and fines, loss of research funding, damaged reputation, and loss of research data.



**Observation:** UH has limited policies and procedures related to foreign influence, visiting scholars, or protection of research data from foreign influence.

***Projects Requiring Export Control Compliance:***

Research grants solicited and awarded at UH fall under the fundamental research definition and do not contain specific language requiring those grant contracts to comply with specific aspects of export control requirements. Thus, EAR and ITAR do not apply specifically to grant contracts awarded to UH. The University is still required to comply with EAR and ITAR regarding aspects, such as restricting work being performed outside the U.S., shipping certain items outside of the U.S., encryption software, participation/access of certain foreign individuals, etc.

UH has no current research projects that specifically require export control compliance nor does UH have the facilities to properly comply with regulations should a research project be undertaken requiring specific export control compliance.

***Foreign Influence:***

Foreign influence in research has become increasingly problematic and U.S. government sponsors have expressed recent concerns regarding the risk of foreign influence on research conducted within the U.S. and creating methods to mitigate some of the risks faced by academic research institutions.

UH currently relies upon trust-based controls for identification of issues surrounding foreign influence. DoR relies upon faculty researchers and/or staff to contact the DoR regarding issues that may arise from the various forms of foreign influence, such as foreign visitors to campus, international travel, international shipping, and foreign talent recruitment programs. DoR can provide guidance issued by the Department of Energy, National Science Foundation, or other relevant sources to faculty researchers, as requested.

DoR is reliant upon faculty researchers to receive notification of visitors. UH currently provides information on their website related to foreign influence and/or visiting scholars but has limited written policies related to such topics. Because notification of visitors doesn't generally occur, UH has no way to monitor the locations visited or the information shared by the faculty host with the visitor. Once on campus, the visitor may have access to the locations and/or information that the faculty member allows them to have access to.

For international travel, MAPP's 04.02.01 A&B (Travel Paid from State Appropriated and Local Funds) require a completed Export Controls and Travel Embargo Form be attached to the Concur Travel Request and routed to the Office of the Provost for review and approval. However, DoR relies upon the traveler and/or the Provost to email the Travel Request for review by DoR (see International Travel observation below).

For international shipping, the Delivery Services Department requires a completed UH Department Mail Card for all shipping requests. DoR is neither involved in the review of any international shipments, nor are shipping risks and/or best practices communicated to faculty or staff through policies or educational platforms.

In order to recruit graduate students to assist faculty researchers in conducting research, U.S. universities frequently use foreign talent recruitment programs. U.S. government agencies rely upon each university to ensure that its own faculty researchers are not in contact with restricted foreign talent recruitment programs. The agencies expect faculty researchers to provide full disclosure on any programs they have been or are affiliated with. Associating with certain foreign talent recruitment programs can result in a university being ineligible for certain research grants.

**Conclusion:** There is an opportunity to strengthen policies and procedures related to international travel, foreign influence, protection of research data, and association with foreign talent recruitment programs. In addition, there is an opportunity to establish a visiting scholar policy to help ensure UH properly screen and monitor foreign nationals prior to arrival on campus.

## Issue 4 – International Shipping Requests

**Objective:** To determine if UH has policies and procedures in place to effectively monitor outbound shipments to international destinations and exports of information from university laptops during international travel.

**Criteria:** Compliance with export controls laws and regulations requires a combined effort from the export controls compliance offices at UH and faculty researchers. These laws and regulations control equipment and information exported by a university. Best practices have identified risks associated with monitoring outbound shipments and taking university-issued laptops that contain research data on international trips.

**Risk:** The ability to ship information to restricted persons or countries, and take research on international trips, places the university is at risk of having information illegally obtained or incurring export control violations. Violations can result in fines, penalties, loss of research funding, and loss of research reputation.

**Observation:** Although UH Mail Services reviews international shipping request documentation submitted by UH faculty and staff, the review is limited to ensuring that a completed Department Mail Code (DMC) form is attached, valid addresses are provided, and the equipment being shipped is accurately stated on the shipping request. DoR provides guidance on their website related to export controls and when equipment and information can or cannot be exported; however, there is no widespread awareness and education program to ensure faculty researchers are aware of all aspects of export control requirements. In addition, there is no control in place to monitor or ensure that export control requirements are followed with regards to international shipments made by faculty researchers other than the trust based control of self-reporting. The UH export controls compliance officer does not monitor any outbound shipments to international destinations.

**Conclusion:** There are opportunities to establish policies that limit the potential sharing of information with restricted persons and enhance the monitoring of shipments to international destinations or sanctioned countries.

## Issue 5 – International Travel

**Objective:** To determine if adequate review of international travel is occurring prior to a trip and if UH has policies and procedures in place to effectively monitor export of information from university-issued laptops, personal laptops, or other portable devices during international travel to sanctioned locations.

**Criteria:** Best practices suggest that adequately reviewing international travel requests prior to the trip can help a university avoid export controls violations when a faculty researcher traveling internationally shares information

with individuals from sanctioned countries. Additionally, best practices provide guidance on how to avoid theft of computer and research equipment or having a computer illegally accessed during international travel.

**Risk:** Faculty researchers sharing information with individuals from sanctioned countries, or researchers that maintain information on a personal laptop, their primary university-issued laptop, or portable storage devices on international trips expose the university to risks of having information illegally accessed. Both instances can result in export controls violations, loss of research data, loss of research funding, and damaged reputation.

**Observation:** UH utilizes an Export Controls and Travel Embargo Form that must be completed by the traveler and attached to a Concur Travel Request submitted electronically through the Concur Travel Management System. The Export Controls and Travel Embargo Form has a signature line for DoR, and MAPP 04.02.01, states all employees who travel to destinations outside the United States must complete the Export Controls and Travel Embargo Form and receive approval from the Office of Contracts and Grants, if required, before leaving on the trip. However, the form and other guidance from the DoR website and policies are unclear as to when DoR approval is required. For international trips, DoR reviews the travel itinerary, conference meeting schedule, or other relevant information regarding the purpose of the trip provided by the traveler.

However, DoR is not included in the regular electronic routing sequence of a Concur Travel Request, so the process for review and approval is a trust based manual control process that relies upon travelers and/or departments to identify the required approvals and route the Export Controls and Travel Embargo Form via email to obtain the necessary approvals.

In addition, the Export Controls and Travel Embargo Form contains questions that would assist DoR in determining if the travel may involve information, equipment, etc., that may be subject to export control laws. However, because faculty researchers have not received appropriate training regarding export controls and travelling internationally, a faculty researcher may not have the specific knowledge necessary to answer all of the questions on the Export Controls and Travel Embargo form, such as whether or not restricted equipment, materials, software, or technical data will be transported or distributed internationally.

If DoR reviews a Travel Request and sees that the destination is either a sanctioned country or a high risk location, the Research Contracts Officer with export control responsibilities provides the traveler with an email containing information such as best business practices during international travel and a link to U.S. Department of State Travel Warnings, Alerts, & Visa Services, by which a traveler can access travel advisory information for specific areas of travel.

System Administrative Memorandum (SAM) 07.A.08 – Data Classification and Protection, identifies research data necessary to substantiate research results or to satisfy grant-funding requirements, regardless of whether such data was developed by the university or obtained from third parties as Level 1 Data. UH does not have a control structure in place to monitor and ensure compliance with SAM 07.A.08, especially regarding faculty researchers travelling internationally. The University does not have a “clean laptop” loaner program which would allow a traveler to check out a “clean laptop” for any international trips. Although DoR has recently added language to its website encouraging faculty researchers to take a “clean laptop” for foreign travel, currently, all university travelers to international destinations are permitted to take their university-issued laptop with them, which may contain information potentially subject to export controls. UH relies on a trust-based control that the faculty researcher will not expose research data to faculty from sanctioned countries during international travel.

**Conclusion:** There is an opportunity to enhance and automate controls for data security and protection of research information related to possible export control related information and/or foreign influence.

## **Overall Management Response**

Management will create the International Engagement Task Force to develop policies and procedures related to export controls and evaluating best practices for implementation at UH. The policies and procedures will address the following topics:

- Monitoring faculty research activity for compliance with export controls policies and procedures
- Ensuring potential risks related to foreign influence are identified and reported to DoR
- Ensuring that education and awareness training are completed by faculty researchers
- Ensuring that any changes to export controls regulations are properly communicated to research faculty and that new or revised policies and procedures are successfully implemented

As noted in the Task column of the Action Plan, once the policies and procedures are developed, the Task Force will assist management in creating an effective implementation and communication plan.

## Recommendations

All five issues mentioned in this report reflect moderate to significant control weaknesses related to Export Control policies, procedures, and processes. The continued growth of research activity and expenditures at UH will increase the risk exposure and relevance in the future. UH currently has limited policies and procedures and relies upon trust based controls. Future expected growth discussed in UH's Strategic Plan "Together, We Rise. Together, We Soar." includes the goal of becoming a Top 50 public university. This goal will require the university to implement a robust system of controls and monitoring procedures to ensure future compliance with governmental agency laws and regulations and risk mitigation. The Department of Internal Auditing recommends the following:

1. Management should evaluate the organizational structure dedicated to managing the export controls process to ensure that proper oversight can occur.
2. Management should enhance its awareness and education program related to export controls, foreign influence, international travel, visiting scholars, and research data security. The awareness program should include, at a minimum, knowledge related to a general overview of export controls laws and regulations, allowable exclusions, penalties for non-compliance, foreign influence or research data security, and how these impact research conducted at UH. The education plan should include, at a minimum, an evaluation of training needs as well as who should be required to take the training and how compliance should be monitored.
3. Management should enhance policies and procedures for export controls, foreign influence, visiting scholars, foreign talent recruitment, research data security, monitoring international travel and shipments from UH, and required training related to the above referenced topics. These policies should define, at a minimum, export control and compliance requirements; UH's position on grant contracts with export control language; notification and/or approvals for visiting scholars; protection of research data, etc.; reviews, approvals, and monitoring of international travel; and reviews, approvals and monitoring of international shipping.
4. Procedures related to export controls, international shipments, international travel, training, visiting scholars, etc. such as reviews, approvals, monitoring, etc. should be automated, as appropriate.
5. Management should reevaluate the control structure for international shipping requests and institute a process that requires DoR approval prior to shipping.
6. Management should implement a control structure to ensure compliance with System Administrative Memorandum 07.A.08 – Data Classification and Protection. This must include, but not be limited to, elements such as training to staff and faculty regarding the requirements of SAM 07.A.08, review of laptops prior to travelling internationally, and/or a "clean laptop" loaner program.

\* \* \* \* \*

The UHS Department of Internal Auditing would like to thank the UH Division of Research for its cooperation and assistance during this audit process.

Sincerely,

Phillip W. Hurd  
Chief Audit Executive  
University of Houston System

PWH/pwh/AP Audit

Participating Auditors: Brandee O'Neal and Jeff Collier

# UNIVERSITY of HOUSTON

## INTERNAL AUDITING DEPARTMENT

Action Item Number	Audit Area	University	Recommendation Summary	Task	Responsible Person	Targeted Date	Status			
1	Organizational Structure, Policies and Procedures, Awareness and Education	UH	1. Management should evaluate the organizational structure dedicated to managing the export controls process to ensure that proper oversight can occur.	Management will assemble an International Engagement Task Force with individuals from the Provost Office, Division of Research, IAD, General Counsel, and Compliance to address the topics identified in the recommendations.	Sr. VP for Academic Affairs and Provost	10/31/2021	Action Complete			
			2. Management should enhance its awareness and education program related to export controls, foreign influence, international travel, visiting scholars, and research data security. The awareness program should include, at a minimum, knowledge related to a general overview of export controls laws and regulations, allowable exclusions, penalties for non-compliance, foreign influence or research data security, and how these impact research conducted at UH. The education plan should include, at a minimum, an evaluation of training needs as well as who should be required to take the training and how compliance should be monitored.							
			3. Management should enhance policies and procedures for export controls, foreign influence, visiting scholars, foreign talent recruitment, research data security, monitoring international travel and shipments from UH, and required training related to the above referenced topics. These policies should define, at a minimum, export control and compliance requirements; UH's position on grant contracts with export control language; notification and/or approvals for visiting scholars; protection of research data, etc.; reviews, approvals, and monitoring of international travel; and reviews, approvals and monitoring of international shipping.					The International Engagement Task Force will evaluate the organizational structure of resources dedicated to monitoring faculty research activity, develop policies and procedures, and create an awareness and education plan for faculty researchers regarding compliance with export controls regulations.	International Engagement Task Force Chair (Sr. VP for Academic Affairs and Provost)	5/31/2022
			4. Procedures related to export controls, international shipments, international travel, training, visiting scholars, etc. such as reviews, approvals, monitoring, etc. should be automated, as appropriate.					The International Engagement Task Force will develop a communication and implementation plan to ensure the new procedures regarding international research activities and compliance with export control regulations are effectively implemented.	Sr. VP for Academic Affairs and Provost	8/31/2022
			5. Management should reevaluate the control structure for international shipping requests and institute a process that requires DoR approval prior to shipping.					Management will be responsible for full implementation of the Task Force's recommendations.	VP for Research and Technology Transfer	
			6. Management should implement a control structure to ensure compliance with System Administrative Memorandum 07.A.08 – Data Classification and Protection. This must include, but not be limited to, elements such as training to staff and faculty regarding the requirements of SAM 07.A.08, review of laptops prior to travelling internationally, and/or a “clean laptop” loaner program.							