

Request for Approval under the “Generic Clearance for the Collection of Routine Customer Feedback” (OMB Control Number: 0690-0030)

TITLE OF INFORMATION COLLECTION: BIS Educational Seminars Survey

PURPOSE: To gather information from U.S. universities related to their export control systems.

BIS administers and enforces controls on the export, reexport and transfer (in-country) of dual-use and less-sensitive military items. These controls are applicable to all U.S. persons, including individuals, businesses, government agencies, and academic institutions, as well as to non-U.S. persons under certain conditions.

On May 12, 2020, the General Accountability Office (GAO) released a report “Export Controls: State and Commerce Should Improve Guidelines and Outreach to Address University Specific Compliance Issues”. In the report, GAO recommended that BIS, in consultation with university representatives, should provide additional or revised guidance in support of universities’ understanding of, and compliance with, the requirements of the Export Administration Regulations (EAR) (15 CFR 730 – 774). BIS agreed with GAO’s recommendation and committed to consult with representatives of the U.S. university community and to issue new and/or revised university-specific export control guidance.

The investigation completed by GAO prior to issuance of its report included feedback from export compliance officers (ECOs) at ten universities. BIS has determined that feedback indicating the depth of understanding of export controls as well as the specific challenges faced by university ECOs from more than ten respondents is necessary to fully understand the areas in which understanding is poor and to fully address university –specific export control challenges, therefore allowing BIS to draft guidance fully responsive to the need of the university community.

DESCRIPTION OF RESPONDENTS: University Export Control Officers (ECO), and/or university personnel who participate in export control compliance activities.

TYPE OF COLLECTION: (Check one)

- | | |
|---|--|
| <input type="checkbox"/> Customer Comment Card/Complaint Form | <input checked="" type="checkbox"/> Customer Satisfaction Survey |
| <input type="checkbox"/> Usability Testing (e.g., Website or Software | <input type="checkbox"/> Small Discussion Group |
| <input type="checkbox"/> Focus Group | <input type="checkbox"/> Other: _____ |

CERTIFICATION:

I certify the following to be true:

1. The collection is voluntary.
2. The collection is low-burden for respondents and low-cost for the Federal Government.

3. The collection is non-controversial and does not raise issues of concern to other federal agencies.
4. The results are not intended to be disseminated to the public.
5. Information gathered will not be used for the purpose of substantially informing influential policy decisions.
6. The collection is targeted to the solicitation of opinions from respondents who have experience with the program or may have experience with the program in the future.

Name: Mark Crace

To assist review, please provide answers to the following question:

Personally Identifiable Information:

1. Is personally identifiable information (PII) collected? Yes No
2. If Yes, will any information that is collected be included in records that are subject to the Privacy Act of 1974? Yes No
3. If Yes, has an up-to-date System of Records Notice (SORN) been published? Yes No

Gifts or Payments:

Is an incentive (e.g., money or reimbursement of expenses, token of appreciation) provided to participants? Yes No

BURDEN HOURS

Category of Respondent	No. of Respondents	Participation Time	Burden Hours
Non-Profits, State, and Local	100	25 minutes	41.66
Totals	100		42

FEDERAL COST: The estimated annual cost to the Federal government is \$308.33. This cost is based on a GS 13 taking 5 minutes to review each submission at a cost of \$37.00 per hour.

If you are conducting a focus group, survey, or plan to employ statistical methods, please provide answers to the following questions:

The selection of your targeted respondents

1. Do you have a customer list or something similar that defines the universe of potential respondents and do you have a sampling plan for selecting from this universe?
 Yes No

A survey form will be distributed to ECOs by BIS working with two professional university associations involved in export control compliance, the Association of University Export Control

Officers (AUECO) and the National Council of University Research Administrators (NCURA) on a one-time basis.

Administration of the Instrument

1. How will you collect the information? (Check all that apply)

Web-based survey
(on BIS' public webpage – link provided below)

Survey: https://www.bis.doc.gov/index.php?option=com_rsform&formId=44

Telephone
 In-person
 Mail
 Other, Explain

2. Will interviewers or facilitators be used? Yes No

Please make sure that all instruments, instructions, and scripts are submitted with the request.

All instruments used to collect information must include:

OMB Control No. 0690-0030

Expiration Date: 07/31/2023