



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF THE GENERAL COUNSEL

January 15, 2021

Lisa M. Brown
Vice President and General Counsel
James E. Ward IV
Associate Vice President for Compliance and Ethics
Office of General Counsel
Georgetown University
Columbia Square
37th and O Streets, NW
Washington, DC 20057

via electronic mail

Re: Conclusion of 20 U.S.C. § 1011f Investigation (Georgetown University)

Dear Ms. Brown and Mr. Ward:

On June 13, 2019, the U.S. Department of Education (“Department”) notified Georgetown University (“GU”) that it had commenced an investigation of GU pursuant to the disclosure requirements of 20 U.S.C. § 1011f (“Section 117”). The Department’s investigation occurred pursuant to its enforcement authority under Section 117 of the Higher Education Act of 1965, 20 U.S.C. § 1011f, which requires institutions of higher education (“IHEs”) to report statutorily defined gifts, contracts, and/or restricted and conditional gifts or contracts from or with a statutorily defined foreign source(s) to the Department.

On July 15, 2019, the Department received Georgetown’s timely, first production of records in response to the Department’s Notice of Investigation and Record Request. The Department has examined those voluminous records and additional records provided to it in response to supplemental records requests.

The Department is pleased to notify you that it has concluded its Section 117 investigation of Georgetown University. The Department is appreciative of GU’s efforts to identify and provide responsive records, particularly the supplemental records provided during the ongoing pandemic. The Department also commends Georgetown for its commitment to the disclosure requirements of Section 117 and the Department’s statutory enforcement obligations.

The Department recommends the continued prioritization of protecting ongoing research and development activities, often supported by federal taxpayer funds, against conversion, misappropriation, or misuse of critical technologies with multiple applications. The Department

400 MARYLAND AVE. S.W., WASHINGTON, DC 20202-1100
www.ed.gov

The Department of Education’s mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

strongly encourages GU to continue its related security and compliance efforts with all appropriate federal agencies to safeguard against adversarial access to or acquisition of critical technologies.

Please feel free to contact me if you have any questions concerning this matter.

Sincerely,

/s/ Paul R. Moore

Paul R. Moore

Chief Investigative Counsel

Office of the General Counsel

(202) 230-0059

Paul.Moore@ed.gov

cc: Reed D. Rubinstein
Principal Deputy General Counsel
delegated the Authority and Duties of the General Counsel
Office of the General Counsel
U.S. Department of Education

Harley A.J. Methfessel
Senior Counsel for Information and Technology
Office of the General Counsel
U.S. Department of Education

Kevin D. Slupe
Special Counsel
Office of the General Counsel
U.S. Department of