



UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE OF THE GENERAL COUNSEL

January 15, 2021

President Mark Becker  
Georgia State University  
33 Gilmer Street SE  
Atlanta, GA 30303

*Via Electronic Mail*

**Re: Preliminary Inquiry Regarding Potential Violations of 20 U.S.C. § 1011f**

Dear President Becker:

Section 117 of the Higher Education Act of 1965 (20 U.S.C. § 1011f) requires Georgia State University (“GSU”) to disclose gifts, contracts, and/or restricted and conditional gifts or contracts from or with foreign sources to the U.S. Department of Education (“Department”). These reports are posted at <https://studentaid.ed.gov/sa/about/data-center/school/foreign-gifts>.

GSU is one of the nation’s leading research institutions, [classified](#) as a “Carnegie Research-1” or “R-1” institution and ranked 108<sup>th</sup> in the nation by total R&D expenditure according to [data reported](#) by the National Science Foundation. The NSF reported GSU’s 2017 R&D expenditures at \$200,000,000. Carnegie R-1 institutions conduct the bulk of U.S. academic research and are collectively entrusted with billions in taxpayer funds each year. They also tend to collaborate closely with foreign sources, accounting for over eighty-five percent of all funds [reported](#) to the Department. GSU’s self-described engagement with foreign sources includes the [Office of International Initiatives](#) and support from a rich set of [resources](#) relating to developing international agreements, handling logistics and securing funding for international work. For example, GSU has many [International Centers and Institutes](#); a tool called [PantherGlobal](#) lists GSU’s international institutional relationships; and the Office of International Initiatives has a [Strategic Plan](#). Also, GSU supposedly has [over 100 international agreements](#) with over twenty partners in China and more than ten each in South Korea, France, Turkey and Taiwan, although the details of these international agreements are not disclosed.

However, it appears GSU has never filed a Section 117 report. Given this and GSU’s self-described extensive engagement with foreign sources, we are opening a preliminary inquiry, directed by the Department’s Office of the General Counsel with support from the Office of Federal Student Aid, regarding GSU’s Section 117 violations, if any. Please arrange for GSU’s general counsel to contact Paul R. Moore, Chief Investigative Counsel, and/or Kevin D. Slupe,

Special Counsel, at his or her earliest convenience. Also, GSU should produce the following records within twenty-one days:

A. True copies of all gift or donation agreements and/or contracts, whether restricted and conditional or otherwise, by and between GSU and any “foreign source” as defined at 20 U.S.C. § 1011f(h)(2). The relevant time for this request is January 1, 2016 to the present.

B. All records in GSU’s possession or control relating or referring to Section 117 compliance activities and obligations. The relevant time for this request is January 1, 2016 to the present.

Thank you in advance for your cooperation.

Sincerely yours,

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Reed D. Rubinstein  
Principal Deputy General Counsel delegated  
the Authorities and Duties of the General Counsel

cc: Paul R. Moore  
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