

July 24, 2024

BY EMAIL

The Honorable Virginia Foxx  
Chairwoman  
Committee on Education and the Workforce  
U.S. House of Representatives  
2176 Rayburn House Office Building  
Washington, DC 20515

Dear Chairwoman Foxx:

This letter is submitted on behalf of Northwestern University (“Northwestern” or “the University”) in response to your letter dated July 3, 2024 to Northwestern University’s President Michael Schill providing additional questions submitted by members of the Committee on Education and the Workforce (“the Committee”) following the Committee’s May 23 hearing. Please find enclosed the University’s responses.

Sincerely,

A handwritten signature in black ink that reads "David A. O'Neil". The signature is written in a cursive style with a large initial 'D' and 'O'.

David A. O’Neil

## **Questions from Representative Burgess Owens (R-UT)**

1. *President Schill, in your testimony, regarding funding received by Northwestern University from the Qatar Foundation “to fund our campus in Qatar,” you stated that “every dollar has gone to the operation of the campus or the management of the campus.”*
  - a. *Have any Qatari funds been used for programming in the United States?*
  - b. *Are Qatari funds used for faculty and student exchange programs between NU-Q and Northwestern’s campus in Evanston?*
  - c. *Have any of Qatari funds gone to Northwestern University faculty or staff in the United States?*
2. *Has Northwestern accurately and in a timely manner reported all funding from Qatari sources since the inception of the partnership in accordance with Section 117 of the Higher Education Act?*
  - a. *Since the beginning of Northwestern University’s partnership with Qatar, how much money has Northwestern University received from Qatari sources, including Qatar-connected entities such as the Qatar Foundation?*
  - b. *Does Northwestern have a process to vet funds from and contracts with foreign entities?*
  - c. *The Department of Education requires that institutions conduct “reasonable due diligence” when determining if a gift or contract is from a foreign source. What steps does Northwestern take to fulfill such due diligence?<sup>1</sup>*
  - d. *Does Northwestern classify the Qatar Foundation as a foreign source for purposes of Section 117 reporting?*
  - e. *Does Northwestern report NU-Q revenue paid by a foreign source (such as management and administrative fees) under Section 117?*
    - i. *Please provide descriptions and use of such fees.*
  - f. *Section 117 makes no distinction between funds given to a university for use in the United States or abroad. Does Northwestern believe that foreign funds given for international use still must be reported under Section 117?*
  - g. *Northwestern has a “Qatar Support Office (QSO)” which “serves as the Evanston campus administrative resource for Northwestern University in Qatar’s faculty, staff, and students.” According to Northwestern’s website, “The QSO promotes strong academic, operational, and other connections between Qatar and the Evanston campus and supports NU-Q’s strategic initiatives and programs.”*
    - i. *Is the QSO, including its employees and functions, funded by the Qatar Foundation, and if not, how is the QSO funded?*
3. *Northwestern’s Medill School of Journalism has a formal partnership with the Qatari media outlet Al-Jazeera. In your testimony, you said you were only recently made aware of the relationship between Northwestern Qatar and Al Jazeera a week prior to the hearing. You also stated that you were “concerned” regarding the agreement with Al Jazeera.*
  - a. *What elements of the agreement between Northwestern Qatar and Al Jazeera do you find concerning?*

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<sup>1</sup> <https://fsapartners.ed.gov/knowledge-center/topics/section-117-foreign-gift-and-contract-reporting/resources/frequently-asked-questions#FCO>

- b. *Does Northwestern have complete autonomy to begin or terminate relationships between Northwestern Qatar and outside entities?*
  - c. *Does the government of Qatar have control over what entities can partner with Northwestern Qatar?*
  - d. *Are you aware of Northwestern's other international partnerships? If not, do you intend to review such partnerships? How are such partnerships evaluated?*
  - e. *Please provide copies of all contracts/agreements/MOUs that Northwestern University has with Qatar, Qatar Foundation, and any other Qatar entities. Also, please provide copies of any agreements that Northwestern University has with any branch of Al Jazeera.*
4. *Northwestern University in Qatar requires all Journalism majors to complete a 10-week professional residency. The website states that "Students have the opportunity to indicate their preferred track and location, but the final decision of JR site is made by the Journalism Residency Director." According to the Journalism Residency Policies and Procedures, which was available on the NU-Q website as recently as November 29, 2023, there are "many approved sites."*
- a. *Will Northwestern provide the Committee with the list of "approved sites?"*
  - b. *The document also mentions that students may propose a new site by submitting a New Site Request Form. What sites have been denied by Northwestern, and under what criteria have they been denied?*
5. *Governance at NU-Q*
- a. *Northwestern Qatar recently made the switch from "need-blind" to "need-aware" admissions.*
    - i. *What was the rationale behind this decision?*
    - ii. *How is each admission (need-blind and need-aware) defined?*
  - b. *All faculty at NU-Q are required to attend a "faculty orientation program." Who leads this program and what is the content of the orientation?*
  - c. *On the NU-Q website, under the "Sanctions, Outcomes, and Interventions" section of the Student Code of Conduct Policy, it states "other outcomes of an educational, developmental, restorative, supportive, and sustaining nature that may be imposed in conjunction with disciplinary or housing sanctions include the following: ...University or community service: Completion of a project or period of service to NU-Q or Qatar Foundation or with an organization providing services to the community."*
    - i. *What organizations has NU-Q approved, besides the Qatar Foundation, for students to "complete a project or period of service?"*
  - d. *How many times has Northwestern's ombudsperson visited the NU-Q campus since the beginning of 2018?*
  - e. *Does Northwestern have complete autonomy over the following at NU-Q?*
    - i. *Policies regarding student conduct and academic expression;*
    - ii. *Curriculum;*
    - iii. *Student admission;*
    - iv. *Campus leadership selection (Deans, etc.);*
    - v. *Research created at NU-Q or by NU-Q faculty.*
  - f. *Are male and female students separated for any classes at NU-Q?*

- g. *Have NU-Q students or faculty been arrested or threatened by the Qatari government?*
  - h. *The NU-Q website states, “University-enacted policies are found in several sources, including but not limited to the Northwestern University in Qatar Catalog, the University’s website, the Office of Student Conduct, and notices disseminated from time to time by the University or its schools and departments, and—of course—the myNUQ website.”*
    - i. *Please provide the Committee with a full list of all “University enacted policies,” including, but not limited to, those from these sources?*
6. *Contract Management at NU-Q*
- a. *Does Northwestern evaluate partnerships like NU-Q on a regular basis? If so, what is the process?*
  - b. *Who approves any proposed modifications to the contract regarding NU-Q?*

Understanding that the University’s relationship with Qatar is an area of interest for the Committee, Northwestern appreciates the opportunity to provide more information about Northwestern University in Qatar (“NU-Q”). Following the May 23, 2024 hearing, and in response to requests from the Committee, the University has produced significant materials relating to NU-Q that are responsive to the above questions, including as set out below. The University will continue to produce materials in response to the Committee’s requests.

- **On July 8, 2024, the University provided the Committee with information about donations received by Northwestern from the Government of Qatar and other Qatari sources since 2018, including the University’s Section 117 reporting data.** As the University noted in that correspondence, donations received from Qatari sources primarily serve to support the operation of NU-Q. In 2023, approximately 90% of the funds that Northwestern received from the Qatar Foundation was allocated to direct costs for the operation of NU-Q. Qatari funds are also used for certain U.S. programming expenses and faculty and student exchange programs. Northwestern’s Qatar Support Office in the United States is funded by the Qatar Foundation, which provides a supplemental annual payment of \$1.5 million to support certain administrative expenses of that office.
- **On June 17, 2024, the University produced NU-Q’s now-terminated Memorandum of Understanding (“MOU”) with Al Jazeera, dated March 14, 2013.** On July 11, 2024, Northwestern terminated the MOU, and we provided correspondence related to that termination to the Committee on July 15, 2024 and to you and other Members of Congress on July 18, 2024 in response to your letter dated June 21, 2024.
- **Also on June 17, 2024, the University produced to the Committee the 2007 agreement establishing NU-Q, including course and program information, and documents reflecting the renewal of that agreement in 2016 (the “2016 Agreement”).** As set out in the 2016 Agreement, Northwestern maintains full authority over NU-Q’s policies, curriculum, admissions, leadership selection, and research. The University also makes every effort to collaborate and maintain transparent communications with NU-Q. To that end, a University ombudsperson visits the NU-Q campus annually.

NU-Q does not segregate male or female students.

The University prioritizes the safety of its students, faculty, and staff—whether in the United States or abroad—and is not aware of any incidents in the last decade involving students or faculty being arrested or threatened by the Government of Qatar.

As noted in the 2016 Agreement, Northwestern has complete discretion to initiate or terminate relationships between NU-Q and third parties, pursuant to the terms of the agreements with those third parties. The Government of Qatar does not control NU-Q’s decisions regarding the formation of partnerships with third parties. The University and NU-Q have a formal process for reviewing and approving NU-Q’s agreements, which was last updated in December 2022 and outlines financial approval delegations. The University maintains a list of NU-Q’s partnerships, which is subject to review and reevaluation as needed.

Northwestern evaluates all of its international partnerships through a formal process that ensures oversight and input from academic leaders; experts in global research, learning, compliance, and operations; and legal counsel. The University is in the process of conducting its regularly scheduled review of whether to continue the operation of NU-Q. This review is taking place in the framework of Northwestern’s contracting procedures, which include review of contracts with foreign entities and donations received from foreign sources. The specific steps taken as part of this process depend on the nature, scope, and size of the contract or donation at issue and can include review by the University’s Offices of the General Counsel, Alumni Relations and Development, Procurement, and Sponsored Research. This process is designed to provide for appropriate due diligence and compliance with applicable regulations, including to ensure that Northwestern is not dealing with any restricted or sanctioned entity.

The NU-Q Journalism Residency Program is designed to provide journalism and communication students with practical, hands-on experience in the media field through meaningful experience at host organizations (sites). Following a series of discussions with interested students and their faculty references, as well as review of the students’ portfolios, NU-Q matches students with particular sites based on the students’ interests, skills, and career goals. Sites are selected based on a collaborative and interactive process with NU-Q and the students, and the large number of recent sites reflects the diversity of NU-Q students’ interests. Recent sites have included: Africa Uncensored Unlimited; beIN Sports; Euro news; Finn Partners; Fortune Magazine; Grayling; Grazia Middle East; Medill News Service; Rest of World; Romeing; Texas Tribune; Transitions; Grey South Africa, Ogilvy London, Weber Shandwick, VICE Arabia; STAT, the Guardian; and CNN Arabia. The University has not formally rejected any sites.

Dean Marwan Kraidy is the Dean of NU-Q and leads the NU-Q faculty orientation program each year. That program provides an introduction to the University and faculty life; sessions on excellence in teaching, research and service; and an overview of available resources.

NU-Q implemented “need-aware” admissions for its students, in part, so that families would have a clearer indication of the true cost of attendance. “Need aware” admissions means that a request for financial aid and the amount of financial aid a student requires may factor into NU-Q’s admissions decisions.

## **Questions from Representative Erin Houchin (R-IN)**

1. *There is a student at Northwestern University, in your Sociology 220: Health Biomedicine, Culture and Society taught by Northwestern professor Dr. Santiago Molina. According to this student's testimony, Dr. Molina ends every lecture by asking students to sign a petition titled, "The Peoples Resolution Against Israel and for Palestine."*
  - a. *Is it within the University's code of conduct for a professor to use his or her position of authority to advocate for political causes, such as requesting students to sign petitions at the end of class?*
  - b. *What are Northwestern's policies or procedures for handling complaints related to academic freedom, political bias, or discrimination within the classroom, and how are these policies enforced?*
  - c. *Considering the importance of fostering critical thinking and independent thought among students, how does the university ensure that course materials and classroom discussions are presented in a balanced and intellectually rigorous manner, regardless of the instructor's personal beliefs or biases?*
2. *In this same class Dr. Santiago Molina assigned as mandatory reading the article, "Israel's war on Gaza is a health justice issue, too." This article was later proven to be misleading, although that information was never provided to his students.*
  - a. *How does Northwestern ensure that course materials, such as articles assigned for reading, are vetted for accuracy and objectivity, especially when they pertain to sensitive geopolitical issues?*
3. *According to this student's testimony, another student in this same class had to miss a lecture due to a bar mitzvah celebration. This student lied about the cause of the absence, fearing retribution from Dr. Molina if he found out this student was Jewish.*
  - a. *What does it say about the classroom environment when a student feels compelled to fabricate the reason for his or her absence from a lecture due to him or her being Jewish?*
  - b. *How can the university ensure that instances like this do not perpetuate a culture of fear or discrimination among students?*
  - c. *How are you holding Northwestern professors accountable so that Jewish students feel safe to express their views without fear of bias or discrimination?*

As detailed in its May 17, 2024 letter to the Committee, the University has multiple policies that prohibit discriminatory or harassing conduct on campus, including conduct that occurs in the classroom. These include its Policy on Discrimination, Harassment and Sexual Misconduct ("the Policy"), which prohibits discrimination based on identified protected categories, including religion and shared ancestry, as well as Northwestern's Faculty Code of Conduct, which states: "Faculty [have] . . . a responsibility to be accurate in speech and writing, to abide by University standards of academic integrity, and to maintain civility."

In accordance with these policies, faculty cannot abuse their authority, including by requesting that students sign petitions. Further, faculty must ensure that course materials and classroom discussions are accurate, particularly as to controversial topics. Northwestern takes seriously its responsibility to thoroughly investigate—and if appropriate, to discipline—all allegations of behavior contrary to these policies that are brought to its attention.

These policies also detail the important role that the Office of Civil Rights and Title IX Compliance (“OCR”) plays in addressing reports of discrimination and harassment. OCR is responsible for implementing the Policy and investigating alleged violations. If a report is made against a Northwestern faculty member, OCR will investigate that allegation. If a Northwestern faculty member is found to have violated the Policy, the matter is referred to the Provost’s Office, the Dean of the School in which the faculty member works, or the faculty member’s Department Chair to determine an appropriate response.

To preserve the integrity of the disciplinary process, the Faculty Code of Conduct and the Policy require that specific disciplinary actions involving individual faculty members remain confidential. Nevertheless, in response to the Committee’s requests, the University has provided the Committee with extensive materials that demonstrate the University’s actions in response to reports of faculty misconduct, including a chart of disciplinary and conduct cases that identifies matters involving allegations of discrimination or harassment against certain University faculty. In addition, and as detailed in its July 1, 2024 letter to the Committee, the University is undertaking a review of its OCR policies, procedures, and investigative outcomes.

### **Questions from Representative Susan Wild (D-PA)**

- 1. As we look to the summer, and preparation for the fall semester, the potential for similar challenges with respect to campus protests, encampments, and potential violence is a distinct possibility. What is your administration doing now or planning to do over the summer to prepare for the next school year?*

Northwestern is taking a number of steps to continue combatting antisemitism on its campus ahead of the coming academic year. As detailed in its May 17, 2024 letter to the Committee, Northwestern is implementing a series of proactive strategies and initiatives to cultivate a campus environment free of antisemitic violence, harassment, or intimidation and to ensure that every member of the community feels emotionally and physically safe.

*First*, Northwestern is continuing to proactively enhance security to ensure the physical safety of its students, faculty, staff, and visitors. This effort includes increasing police patrols at locations of significance and surging additional security resources upon need or request. The University is also making progress on upgrading its overall security profile.

*Second*, Northwestern is continuing to improve communication between its leadership and the student community to ensure that the University heeds the needs and concerns of students.

*Third*, Northwestern is revising its policies and procedures to ensure it has the necessary tools to address antisemitic harassment and intimidation while upholding its values of free speech and due process. Northwestern previously issued an Interim Addendum to the Student Code of Conduct to immediately enhance the safety of its community, and is now reviewing and updating its demonstration policy; display policy (e.g., fliers, chalking, etc.); Title IX and OCR policies and processes; and its Student Code of Conduct, which will be published in time for the 2024-2025 academic year.

*Fourth*, Northwestern is taking specific actions to address antisemitism on campus in a manner consistent with its core mission to educate students in an inclusive educational environment, including:

- Convening seven seminars during the 2023-2024 academic year that brought in Israeli experts and scholars, and continuing those seminars in the coming academic year;
- The addition of a module on combatting antisemitism for the entire Northwestern community;
- The inclusion of Jewish people, culture and history in DEI programming;
- The establishment of the Center for Enlightened Disagreement; and
- Participating and promoting ongoing programming addressing complex issues, including the conflict in Israel and Gaza, through organizations including the Chabad House; the Medill School of Journalism; the Crown Family Center for Israel and Jewish Studies; and the Northwestern Israel Innovation Project.

*Finally*, the University has implemented several new advisory and training initiatives, including the creation of a new Advisory Committee on Free Expression and Institutional Speech, and will create new policies and guidelines based on the Committee's findings.