

THE CORRUPTION OF THE AMERICAN MIND: HOW FOREIGN FUNDING IN U.S. HIGHER EDUCATION BY AUTHORITARIAN REGIMES, WIDELY UNDISCLOSED, PREDICTS EROSION OF DEMOCRATIC NORMS AND ANTISEMITIC INCIDENTS ON CAMPUS

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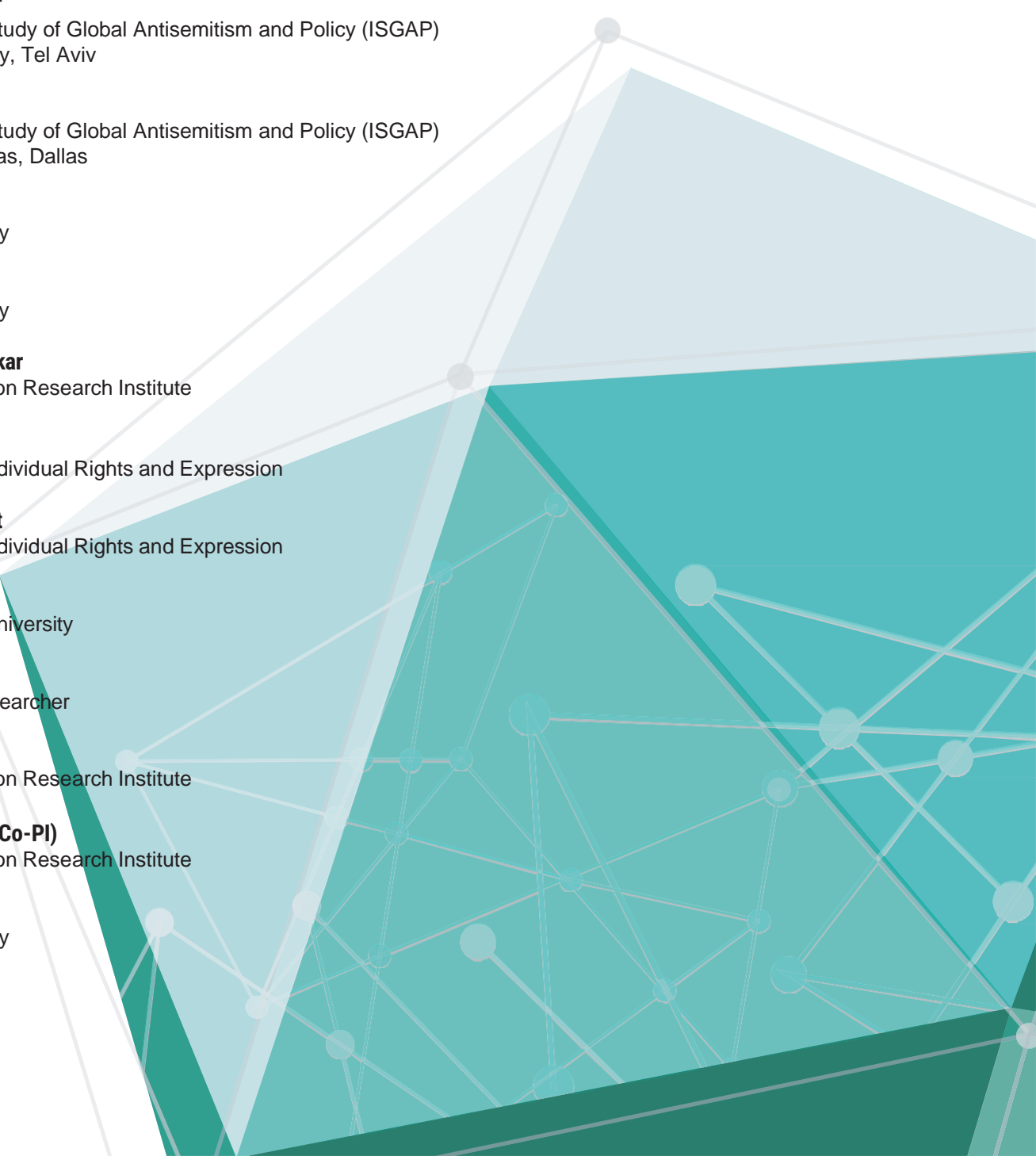
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Abstract

Over the last decade, institutions of higher education across the United States of America received billions of dollars from foreign donors, much of which went unreported, to the U.S. Department of Education, as required. The U.S. Department of Education required that those institutions file reports detailing how much such funding they received and from where in accordance with regulations for foreign gift and contract reporting. Using that information available in public reports, in the present paper, we report 4 studies examining the extent of different avenues of foreign funding and its statistical relationship to campus political climate and events. Because much of this foreign funding was provided by authoritarian regimes, we examined the levels and sources of such funding and the extent to which this funding correlated with a deterioration of liberal democratic norms around free speech and academic freedom, as well as antisemitism on campus. Because campus antisemitism is not well characterized in peer-reviewed literature, we sought to assess its concurrent validity among other national assessments of antisemitism (reported by the FBI, ADL). All r 's were high ($\sim .50$) indicating strong spatial correspondence between the three assessments.

After an initial assessment of the distribution of foreign funding in our sample and campus antisemitism validity study (Studies One and Two respectively) Study Three found that receipt of foreign funding was associated with erosion of free speech norms: Increased campaigns to punish scholars for their speech (it was associated with increased levels of such campaigns from both the left and the right). Studies Four through Six addressed the relationship between foreign funding and antisemitism. Study Four found that receipt of foreign funding was associated with increased levels of campus antisemitism, and this relationship was larger when the foreign funding came from Middle Eastern/authoritarian states. Study Five found that receipt of foreign funding predicted increased perceptions of campus antisemitism in a national survey administered to 1748 college students. Using Granger Causality temporal analyses, Study Six found: 1. a positive directional association between campus antisemitic incidents and antisemitic incidents on the county level; and 2. a higher temporal correlation between use of the #Israeliapartheid hashtag on Twitter and antisemitic incidents at education institutions that received foreign funding than those institutions that did not.

In its totality, these findings described how a lack of transparency in funding reporting occurred in tandem with increases of antidemocratic norms and antisemitism across American institutions of higher education. Discussion addresses limitations to this research, the role of non-transparent foreign funding of higher education in eroding liberal democratic norms and exacerbating intergroup conflict, and directions for future research.

Overall Conclusion: *A massive influx of foreign donations to American institutions of higher learning, much of it concealed and from authoritarian regimes, with notable support from Middle Eastern sources, reflects or supports heightened levels of intolerance towards Jews, open inquiry, and free expression.*

Key Findings

- In our sample of Top American colleges and universities (n=203) we analyze approximately \$13 billion in reported contributions from foreign governments, many of which are authoritarian - Over a broader set of all institutions, \$4.7 billion of total funding from

2014-2019 was previously undisclosed.

- In institutions in our sample receiving such funding:
 - Political campaigns to silence academics were more prevalent.
 - Campuses receiving foreign funds exhibited approximately twice as many campaigns to silence academics as those that did not.
 - Students reported greater exposure to antisemitic and anti-Zionist rhetoric.
 - Higher levels of antisemitic incidents were reported on their campuses.
 - This relationship of foreign funding to campus antisemitism was stronger when the donors were Middle Eastern regimes rather than other regimes.
 - From 2015-2020, institutions that accepted funding from Middle Eastern donors had, on average, 300% more antisemitic incidents than those institutions that did not. Campus-level antisemitic incidents forward predict county-level antisemitic incidents.
- Speech intolerance—manifesting as campaigns to investigate, censor, demote, suspend, or terminate speakers and scholars—was higher at institutions that received funding from foreign regimes.
- Institutions receiving funding from foreign regimes evidence higher correlation between antisemitic incidents and inflammatory social media signals than those that do not.

Introduction: Widespread Failure to Report Donation from Foreign Regimes

Section 117 Foreign Gifts and Contract Reporting - “Section 117 of the Higher Education Act of 1965 (HEA) requires institutions of higher education that receive federal financial assistance to disclose semiannually to the U.S. Department of Education any gifts received from and contracts with a foreign source that, alone or combined, are valued at \$250,000 or more in a calendar year. The statute also requires institutions to report information when owned or controlled by a foreign source.” Throughout the rest of this paper, we use the term “Section 117 Funding” to refer to funds received by institutions of higher education that were (eventually) reported under this requirement.

In July 2019 at the Department of Justice (DOJ), in Washington, D.C., Charles Asher Small, the Director of ISGAP, presented the findings of an ISGAP research project prepared by Michael Bass. CPA that started in 2012, entitled “Follow the Money.” The ongoing research project examined all reported funding to the DOE by United States universities from foreign governments, foundations and corporations, many of which adhere to and promote anti-democratic and antisemitic ideologies, with connections to terrorism and terror financing.²

The project revealed, for the first time, the existence of substantial Middle Eastern funding (primarily from Qatar) to U.S. universities that had not been reported to the Department of Education (DoED), as required by law.

² “VOLUME II Examining Undocumented Foreign Funding of American Universities: Implications for Education and Rising Antisemitism,” *ISGAP* (2020).
<https://isgap.org/post/2020/09/volume-ii-examining-undocumented-foreign-funding-of-american-universities-implications-for-education-and-rising-antisemitism/>

In fact, Bass’s research for ISGAP uncovered close to three billion of dollars of unreported funds, which, in turn, helped to the launch of a federal government investigation in 2019. With the explosion of antisemitism at U.S. universities in recent weeks, there are also security concerns that have potential domestic and global implications.

In 2019, the U.S. The Department of Education uncovered billions of dollars in undocumented foreign funds contributed to American universities, with a good deal of it coming from authoritarian regimes hostile to the fundamental principles of democracy and human rights. The findings displayed sizable year over year discrepancies and non-transparent practices by universities across reports from the department’s Section 117 portal for foreign gift and contract reporting. These discrepancies raised serious questions about the integrity of Section 117 funds, and the findings captured the attention of lawmakers and led to numerous presentations, investigations, and testimonies involving U.S. officials from the Department of Education (Camera, 2020; Dennett, 2019; Thompson et al., 2020). In this paper, we report the results of research investigating the relationships between flows of Section 117 funds to institutions of higher education in the U.S., and campus threats to free speech and rises in antisemitism.

Undocumented money provides a frustrating research subject, given the obfuscation involved. Studies of this form of secretive influence, the most notorious of which involves groups or individuals funneling money into political and publicity campaigns through anonymized vectors shielded from public scrutiny, tend to focus on issues of “conflicts of interest, transparency, academic and scientific integrity, and coercion” (Jones, 2014). Yet while the sources of the funds may be unknown to the public, philanthropic contributions often come from efforts to establish close relationships, especially in the long term (Morrison, 2015), these funding relationships can even lead to the donor and recipient co-creating “gifts” together (Shaker & Nelson, 2021).

Examples of “undocumented money” include the tobacco industry, oil and gas, and pharmaceutical companies (Jones, 2014), and a recent study indicates the flow of such undocumented funds to U.S. universities from foreign governments, particularly in the Middle East (Small & Bass, 2019). Efforts by countries in the Middle East to influence politics and society in the West is well documented. Roberts (2019) and Diwan (2021) argue that Qatar develops institutions to promote “soft power” in the West in order to improve its relationship with established powers and its role in the Middle East. Felsch (2016) argues that Qatari influence networks cannot be considered “soft power,” since it depends more on wealth and payments to “affect outcomes”—a form of “hard power.” Walsh (2011, 2019) discusses Qatar’s efforts to develop relationships with U.S. universities as a kind of “win-win” through which the country hopes to develop more critical thinking among its own citizens. However, others caution that the development of transnational academic relationships with authoritarian states must proceed with caution, even while promoting the virtues of an open society (Long, O’Connell, & Hugins, 2021).

The present study examined the relationship of foreign funding, much of it previously undocumented, to democratic norms and antisemitism in institutions of higher education in the U.S.

Research Questions

In the present report, we examine two potential malevolent consequences of receipt of foreign (Section 117) contributions: 1. erosion of free speech and academic freedom and 2.

antisemitism. How might this work within universities? First, Section 117 funding, especially from hostile regimes, may be used to create a generally intolerant intellectual environment on campus. Second, the funding might be used to support and expand the work of faculty who are willing to violate others' speech rights and/or are antisemitic. Third, the funding might be used to support extremist groups on campus whose activities spill over into violation of others' speech rights and antisemitism.

The funding described herein coincides with both increased illiberal, anti-democratic sentiment on American college and university campuses (FIRE, 2022; Rausch, Redden & Geher, 2023; Stevens, 2022) and antisemitic incidents (Beckwith & Rossman-Benjamin, 2022). The present research addressed whether these trends might be related. Are foreign actors buying influence over the U.S. higher education system to promote their own ideological and political preferences? This study investigates those possibilities. This research provides the first effort to quantitatively examine the potential relationship between Section 117 gifts and contract funding that is often incomplete and non-transparent, anti-democratic trends, and levels of antisemitism on American college and university campuses. Specifically, this work investigates five questions:

1. Does Section 117 gifts and funding forecast increased illiberal, anti-democratic behaviors around campus censorship and suppression of academic freedom?
2. Does Section 117 funding of institutions of higher learning correlate with higher levels of documented antisemitic activity on those campuses?
3. Does the receipt of funds from Middle Eastern regimes or more authoritarian leaning regimes forecast more campus antisemitic activity than contributions from other entities?
4. Is Section 117 funding associated with students' perceptions of antisemitism on campus?
5. How do campus antisemitism and Section 117 funding correspond or interact, if at all, with social media signals and county level antisemitism?

Data and Methods Common Across Studies

Data Sources and Aggregation

We drew on eight data sources at different levels of analysis to investigate our research questions. Institutions were sampled from the 2022 U.S. News and World Report "Best Colleges" rankings for liberal arts colleges and the top one hundred national research universities (n=203). To model geographic patterns of antisemitism more broadly, we used a more-comprehensive dataset of 402 institutions of higher learning across 179 U.S. counties, along with county-level sources on antisemitic activity and population. The data sources drawn upon include:

1. The Federal Bureau of Investigation's (FBI) uniform crime reporting database³

³ FBI Crime Data Explorer, Hate Crime Statistics, 2015-2020, Last accessed March 12, 2022, <https://cde.ucr.cjis.gov/LATEST/webapp/#/pages/home>.

2. The Anti-Defamation League (ADL) Antisemitic Incident Tracker⁴
3. Foundation for Individual Rights and Expression's Scholars Under Fire database⁵
4. Survey data on university students' attitudes toward Israel, allowing controversial speakers on campus, the acceptability of illiberal protest tactics, and their experiences with antisemitism on campus obtained by Prolific
5. Incident data from the AMCHA Initiative⁶
6. County demographic data from ACS 2017⁷
7. The Carnegie Classifications of Institutions of Higher Education (CCIHE) database⁸
8. Investigative accounting from the DOE performed by Michael Bass CPA for the Institute for the Study of Global Antisemitism and Policy (ISGAP) on undocumented funding to campuses⁹

These data sets all possess unique methodological and coverage strengths and limitations. Limitations in one data set are compensated by strengths of another so that, together, they capture important and different dimensions of antisemitism and anti-democratic trends on American university campuses and their surrounding communities. For example, FBI hate crimes are underreported (Pezzella, Fetzer & Keller, 2019). The ADL's Antisemitic Incident Tracker is nationwide, but shows a "spotlight effect" and relies on different methods than law enforcement. AMCHA's records and the survey data analyzed pertain only to campuses.

In this report, we use the term, "expression" to refer to expressions of antisemitism on campus that do not target particular students or Jewish Institutions, such as episodes of antisemitic graffiti, slogans and chants. "Targeting" refers to incidents of antisemitism on campus directed at specific students and institutions. We sometimes refer to foreign funding documented from section 117 reports throughout the report as "foreign funds" or simply "foreign funding" for simplicity.

Study 1: Levels of Foreign Funding

We began by determining the levels of section 117 foreign funding U.S. institutions of higher learning received from foreign governments in 2014-2019. This is the timeframe used because it is the timeframe covered by U.S. Department of Education investigations (Camera, 2020; Dennett, 2019; Thompson et al., 2020).

⁴ ADL H.E.A.T. Map™ (Hate, Extremism, Antisemitism, Terrorism), 2015-2020, Last accessed December 29, 2022, https://www.adl.org/resources/tools-to-track-hate/heat-map?gclid=CjwKCAiAkrWdBhBkEiwAZ9cdcGn5vjcrl6lXL4xnyLGlaMJWtIwQwJnk9hJELfxdNcUYSdzOg56gXxoCc2UQAvD_BwE.

⁵ FIRE's Scholars Under Fire database is available online: <https://www.thefire.org/research-learn/scholars-under-fire>.

⁶ AMCHA Initiative, Incidents, Years 2015-2020, <https://amchainitiative.org/search-by-incident#incident/display-by-date/>.

⁷ <https://www.census.gov/acs/www/data/data-tables-and-tools/data-profiles/2017/>

⁸ The Carnegie Classification of Institutions of Higher Education (n.d.). About Carnegie Classification. Retrieved (date optional) from <https://carnegieclassifications.acenet.edu/>.

⁹ NCRI will provide collected reports from DOE and other underlying documentation for forensic analysis upon request.

In 2019, the Department of Education structured an online portal and issued a call to institutions of higher learning to report on donations from foreign regimes shown to be widespread and many were withheld in violation of federal regulations. The data derived in this research was obtained from these DOE reports of foreign funds. The institutions that received funding (n=293) cumulatively (from 2014 to 2019) obtained a sum total of \$15,763,675,142, from 2014-2019.

Section 117 Funding Sources 2014-2019	
<u>Country</u>	<u>Funds</u>
Qatar	\$2,693,008,951
England	\$1,394,656,596
China	\$1,173,301,694
Saudi Arabia	\$947,593,558
Bermuda	\$899,593,972
Hong Kong	\$873,645,599
Canada	\$705,879,958
Japan	\$635,656,787
Switzerland	\$577,656,787
India	\$531,735,380
Germany	\$426,916,662
United Arab Emirates	\$399,769,602

Table 1.a.

Countries providing the highest levels of Section 117 funding to U.S. institutions of higher education.

U.S. Institutions Receiving the Largest Amounts of Section 117 Funding	
<u>University</u>	<u>Funds</u>
Carnegie Mellon University	\$1,473,036,665
Cornell University	\$1,289,433,376
Harvard University	\$894,533,832
Massachusetts Institute of Technology	\$859,071,692
Texas A&M University	\$521,455,050
Yale University	\$495,851,474
Northwestern University	\$402,316,221
Johns Hopkins University	\$401,035,647
Georgetown University	\$379,950,511
University of Chicago	\$364,544,338
University of Colorado Boulder	\$345,389,137
Duke University	\$343,699,498

Table 1.b.

Universities receiving the highest levels of foreign (Section 117) funds.

U.S. Institutions Receiving the Largest Amounts of Previously Unreported Funding	
<u>University</u>	<u>Funds</u>
Cornell University	\$950,610,704
Yale University	\$376,917,577
Brigham Young University	\$322,259,863
University of Colorado Boulder	\$294,104,134
University of Texas MD Anderson Cancer Center	\$277,217,163
Massachusetts Institute of Technology	\$172,524,130
Texas A&M University	\$141,976,889
University of Chicago	\$136,713,349
Columbia University in the City of New York	\$80,725,000
Boston University	\$78,281,379
New York University	\$68,290,254
University of California, San Diego	\$62,003,116

Table 1.c.

Universities receiving the highest levels of previously undisclosed foreign (Section 117) funds.

The values described above in Tables 1.a., 1.b., and 1.c. are used in all subsequent studies in this paper assessing the relationship of funding to other outcomes.

Study 2: Validation of Measures of Antisemitism

Because one purpose of the present project was to examine whether receipt of Section 117 funding from foreign countries correlates with antisemitism, we needed to first identify credible assessments of antisemitism. Several very different types of organizations provide such assessments. The Federal Bureau of Investigation (FBI) provides a national assessment of hate crimes, including those against Jews. The Anti-Defamation League (ADL) provides a national assessment of antisemitic incidents, which includes in situ propaganda and attacks. AMCHA is an American nonprofit that describes itself as “dedicated to investigating, documenting, educating about, and combating antisemitism at institutions of higher education in America” (AMCHA Initiative, n.d.). Its activities include monitoring antisemitic and anti-Zionist activities on campuses.

We do not take any particular data source as definitive of antisemitic activity, but combine and compare these models to capture a more holistic picture of the data. For example, the survey sampling college students’ perceptions of antisemitism on their campuses says nothing about such perceptions among the general public. Furthermore, ideal data reporting rarely occurs for tracking hate incidents in general. AMCHA, for instance, has faced criticism for cataloging BDS activity as antisemitic, because to some it is interpreted as human rights activity. But AMCHA data also includes incidents in which students are specifically targeted in the classroom for being Jewish, as well as overt expressions of antisemitism on campus such as swastikas and anti-Jewish slurs. The ADL’s antisemitic incident reports include a variety of incidents including slurs, the display of hate symbols, and violent attacks, but it may lack the same reach of law enforcement-reported incidents, particularly in lower-population areas. We drew from each data source in order to assess whether Section 117 foreign funds may have impacted the incidents reported by those organizations and agencies. It is precisely because each data set has its own limitations that we use all of them. We can, therefore, evaluate the robustness of any findings with respect to differences in data collection across entities.

Methods

Because the FBI, ADL, and AMCHA are organizations with very different missions and approaches to measuring antisemitism, our first objective was to assess the consistency among their reports. Data on antisemitic acts and incidents from the FBI, ADL, and AMCHA were collected from their websites for the years 2015-2020. We first analyzed these data on a county level, using a histogram to assess their distributions and simple Spearman’s correlation coefficients to understand the relationship of their variance. The histogram showed over-dispersal in each variable, with some high outliers in the FBI data.

Results

Figure 1 shows 3 maps of the USA, each colored by the percentile of the count of antisemitic incidents occurring in each county per the titled dataset. The maps reflect: 1. The different overall levels in antisemitism reported by the three sources; and 2. The geographic similarity in the patterns of antisemitism each source reports.

To further assess the degree of overlap between the measures, we assessed the correlation between the three measures by county. Table 2 reports close correlation between reporting systems by county, showing significant overlap. These high correlations are interpretable as indicating that, despite their differences, they are all capturing similar patterns of antisemitism by county.

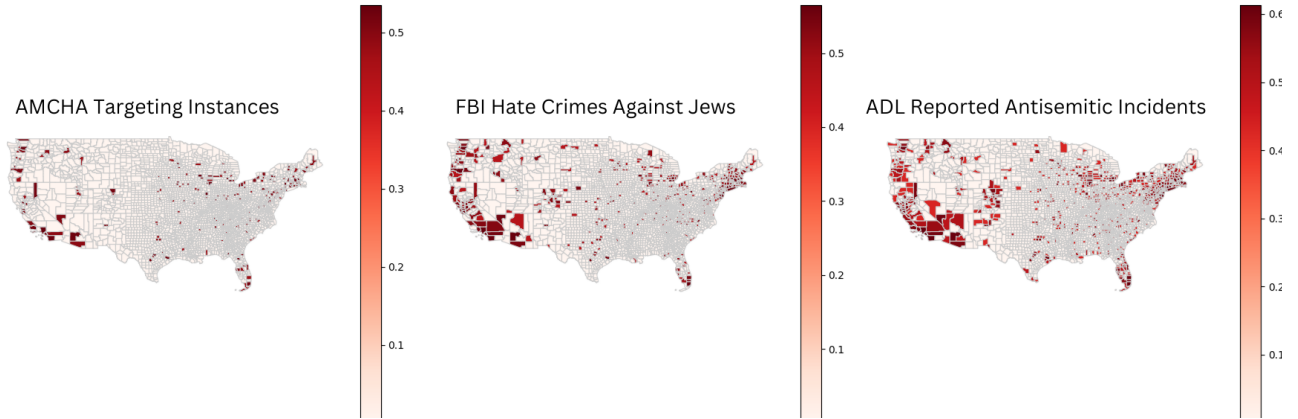


Figure 1. The figure above shows 3 maps of the USA, each colored by the percentile of the count of antisemitic incidents occurring in each county per the titled dataset.

	AMCHA Targeting Instances	FBI Hate Crimes Against Jews	ADL Reported Antisemitic Incidents
AMCHA Targeting Instances	1.000	*	*
FBI Hate Crimes Against Jews	0.480	1.000	*
ADL Reported Antisemitic Incidents	0.527	0.564	1.000

Table 2. Spearman correlation between the percentile counts of antisemitic incidents per dataset.

Study 3. Potential Underlying Mechanisms: Polarization Eroding Campus Conversation

Study 3 examined whether there was a relationship between receipt of Section 117 funding and erosion of liberal democratic values around speech and academic freedom. We therefore began by examining the FIRE’s Scholars Under Fire¹⁰ databases on campaigns targeting academic figures on college campuses. FIRE describes the cases included in this database as follows: “a campus

¹⁰ FIRE’s Scholars Under Fire database (2015-2021) is available online: <https://www.thefire.org/research-learn/scholars-under-fire>. It is, however, constantly being updated so that current data may differ from those reported here. Updated records for these databases will be integrated into future research.

controversy involving efforts to investigate, penalize or otherwise *professionally* sanction a scholar for engaging in constitutionally protected forms of speech. Our definition of a *targeting incident* does not include instances in which the scholar is subjected to harassment and/or intimidation, including death threats, but does not face an attempt at being professionally penalized or sanctioned. Nor does it include cases where the individual(s) or group(s) expresses opposition to a scholar’s speech, but does not make any demands that the scholar and/or institution take action to remedy the situation.”

We examined whether Section 117 foreign funds might be more broadly associated with ideological incidents of targeting academic scholars for sanction, including campaigns to investigate, censor, demote, suspend or terminate. Research by FIRE has indicated that activities such as these have increased sharply in recent years on college campuses (Honeycutt & Jussim, 2022). FIRE has made their databases publicly available to better investigate the phenomena.

Methods

After initial exploratory data analysis, we modeled the effect of Section 117 foreign funds on a variety of indicators of antisemitic and anti-democratic initiatives on campus. Depending on the dependent variable, we either used the raw amount of funding received by the university or transformed the funding using a logarithm, since the donations were orders of magnitude different from each other (\$10 million vs. a billion).

The data on scholars targeted by campaigns includes 479 incidents between the years 2015-2020, with 278 coming from the left of the scholar and 177 coming from the right of the scholar (24 did not have discernable political characteristics).¹¹ Ivy League universities were overrepresented in the number of incidents on campus, with four schools (Harvard, University of Pennsylvania, Columbia, and Yale) featured in the top 20.

We analyzed these data using a fixed effects ordinary least squares model, using the year as the fixed effect. This enables us to assess the trends from each year, including the impacts of the previous year’s funding. We used the Python package statsmodels API to construct the models using the `entity_col` function for year.

Results

Campaigns Against Scholars

Our findings showed that campaigns targeting academic scholars are correlated with the distribution of Section 117 funds by campus (Table 3). This effect was statistically significant and showed correlations between the Section 117 funding and campaigns to suppress or punish speech coming from both the political left and political right of the scholar in question.

Scholars Under Fire

¹¹ “From the left” means the campaign against the speaker came from those to the left of the speaker; “From the right” means the campaign against the speaker came from those to the right of the speaker. In other words, this terminology does not mean that the campaigns themselves are being initiated by the political “left” or “right.”

	<i>Dependent variable:</i>		
	Left of Scholar	Right of Scholar	Total
Section 117 funding	3.742e-09** (4.72e-10)	1.378e-09 ** (3.47e-10)	5.12e-09** (5.69e-10)
Constant	-0.146 (0.0753)	0.5944** (0.058)	1.4515** (0.95)
R ²	0.22 +- .03	0.043 +- 0.015	0.241 +- 0.049
Akaike Inf. Crit.	887	721	987

Table 3. Relationship of Targeting Incidents against Academic Speakers from 2015-2020 to Section 117 funding. N=270. Linear Regression coefficients shown; standard errors in parentheses. ** $p < .01$. R² values, shown with std. are cross validated with 5-fold cross validation. The average campus that did not receive Section 117 funding had 1.3 campaigns targeting scholars on average, while campuses that received Section 117 funding had almost double (2.3).

Study 4: Association of Section 117 Funding with Antisemitic Activity

Research suggests that authoritarian, anti-democratic ideologies and practices, are often accompanied by antisemitism (Allington, Hirsh & Katz, 2023). Antisemitism has been referred to as the “canary in the coal mine” for the rise of authoritarian and anti-democratic ideologies worldwide (U.S. House, 2013). Corruption, authoritarianism, and antisemitism often go hand-in-hand (Allington, Hirsh & Katz, 2023; Glasius, 2018). Furthermore, some of the largest contributors of Section 117 funding of institutions of higher education came from Middle East sources, most of which are both authoritarian and have long histories of antisemitic and anti-Zionist agendas. Therefore, Study 4 assessed the relationship between receipt of Section 117 funding and antisemitism. It assessed three specific hypotheses:

Are there heightened levels of antisemitism when:

1. institutions received versus did not receive Section 117 funding?
2. institutions received Section 117 funding from Middle Eastern sources as opposed to other sources?
3. institutions received Section 117 funding from sources from more authoritarian countries than from other sources?

Methods

Of the list of U.S. News and World Report “Best Colleges” (n=203) in our sample one hundred of the set of 203 institutions of higher education that we sampled received Section 117 funding; 18 of these 100 institutions were private and 82 were public universities. The sum of these funds amounted to about \$13 billion from 2014-2019 (see Appendix 1 for totals received by each institution). The median contribution was about \$32 million, and the mean contribution was \$130.6 million. A small subset of the institutions received disproportionately large amounts of the funds. The eight Ivy League schools were disproportionately represented in the highest-funded institutions,

as five of them—Cornell (2nd) and Harvard (3rd), Yale (6th), Stanford (14th), Columbia (16th) and the University of Pennsylvania (18th)—placed in the top twenty overall. The top three universities (Carnegie Mellon, 1st) received an average of \$1.2 billion over this five-year time period, whereas the rest of the top ten averaged \$489 million.

We then created panel data including the years 2015-2020 and included the quantity of antisemitic incidents recorded by AMCHA for each year. We included Section 117 financial contributions as reported by ISGAP, offset by one year to assess the impacts of the previous year’s funding on the current year’s antisemitism. We further delineated funding from Middle East sources from non-Middle East sources, and funding from the 30 most authoritarian states and those not in the top 30¹² (Table 4).

Analyses were based on antisemitic incidents (as reported by AMCHA) for each of 203 institutions over six years, from 2015-2020.

Thus, each university or college features across six records including a year from 2015-2020 (n=1,218), a quantity of antisemitic or anti-Zionist incidents (targeted antisemitism or expression of antisemitism for the former, and BDS proclamation or protest for the latter), and the previous year’s Section 117 funding amount (categorized to distinguish between general funding, Middle East funding, and authoritarian funding).

Summary descriptives for receipt of Section 117 funding

Source:	N	Mean	Maximum
Total funds received by year	447	\$10,758,055	\$853,896,448
30 Most Authoritarian	268	\$1,547,628	\$68,876,904
Countries Not in Top 30	419	\$8,432,505	\$852,896,448
Middle East	217	\$2,993,309	\$181,908,282
Not Middle East	437	\$7,764,555	\$775,639,882

Table 4. N is the total number of times 203 institutions of higher education received Section 117 funding from 2014-2019. Mean is the average Section 117 funding received per institution per year across all years and institutions. Maximum is the most Section 117 funding received by any university in a single year in this time period. There is some overlap between Middle East/non-Middle East and top 30 authoritarian/non-top 30 authoritarian nations’ funding by institution per year, since each institution may have received funding from multiple sources in any given year.

Results

Analysis Overview

¹² We labeled “authoritarian” any nation listed by the Economist Intelligence Project’s top 30 most authoritarian countries in the world from 2017, plus Russia (https://pages.eiu.com/rs/753-RIQ-438/images/Democracy_Index_2017.pdf). Any country outside this list, was labeled as being “not-top 30” for purposes of this project.

Next we sought to understand the relationship between Section 117 funding and campus antisemitic activity. We started by visualizing the dispersion or overdispersion of funding on an institutional level using a histogram. Then, we created campus antisemitic activity panel data by annualizing AMCHA-reported incidents and the binary presence or non-presence of funding during the previous year, moving the incidents forward one year to test whether the previous year's funding correlated to the present year's incidents. We employed fixed-effects, generalized linear models on the institutional level to determine the extent to which Section 117 funds predict the rate of campus antisemitic activity over time, using the year as a fixed effect and taking the log of the total sums of Section 117 funds to compensate for some overdispersion.

Main Findings

Our analysis shows, with a high level of confidence, a correlation between the existence of Section 117 funding and incidents of targeted antisemitism and antisemitic expression on campus (Table 5).

Section 117 Funding: Fixed Effects Linear Regression

VARIABLES	Total	Targeting	Expression	BDS
Log Section 117 Funding	0.152** (0.010)	0.0484** (0.004)	0.0784** (0.005)	0.0255** (0.003)
Constant	0.3399 (0.274)	-0.0115 (0.112)	0.1099 (0.149)	0.2415* (0.094)
R ² (5-fold validation)	0.164 +- 0.040	0.112 +- 0.033	0.151 +- 0.035	0.016 +- 0.057

Table 5. Fixed Effects Linear Regressions on the relationship of the log of the amount of Section 117 Funding on Antisemitic Activity from 2015-2020. N=1218. ** $p < 0.01$, * $p < 0.05$.

Middle East Funding and Antisemitic Incidents

We then sought to determine if Section 117 funding received from Middle Eastern regimes had a larger impact than other Section 117 monies on antisemitic activity across universities/colleges. Because non-democratic and authoritarian regimes are often associated with ideological and ethnic intolerance, and Middle East states tend to harbor more anti-Israel sentiments, we developed analyses to examine whether Section 117 funding from such sources are contributing to antisemitic activity and BDS. Hence, we ran the same fixed effects linear regressions after splitting the funding variable into institutions of higher learning that accepted funding from Middle Eastern regimes and all other Section 117 monies (Table 6a). We then ran the same analysis controlling for additional variables in the model to ensure robustness, the student enrollment numbers in universities/colleges, whether the institution is a liberal arts college,¹³ and the presence of the group Students for Justice in Palestine (SJP) on campus (Tables 6b).

In the limited model (Table 6a), Middle East funds proved more correlated in each instance, except when dealing with targeted incidents. In the more expansive model however (Table 6b),

¹³ We selected this control variable in case liberal arts colleges systematically differ from research oriented universities in proneness to antisemitic attitudes or incidents.

funding from Middle Eastern sources forecasted more antisemitic incidents on campus. Funding from countries outside of the Middle East became insignificant when controlling for variables like rank and enrollment. Presence of SJP groups also significantly correlated with antisemitic activity, as did enrollment levels in some cases. In its entirety, these findings suggest a diverse set of variables which forecast antisemitic activity on campus, and the significance of Middle Eastern funding appears robust even when controlling for these variables.

Section 117 Money: Relations to Campus Antisemitism Without Control Variables

VARIABLES	Total	Targeting	Expression	BDS
Middle East Funds (Binary)	2.6349** (0.346)	0.7125** (0.143)	1.4256** (0.148)	0.4968** (0.096)
Non-Middle East Funds (Binary)	2.0946** (0.346)	0.7327** (0.143)	1.0310** (0.151)	0.331** (0.096)
Constant	0.3775 (0.271)	-0.0002 (0.112)	0.1327 (0.148)	0.2450** (0.094)

Table 6a. Fixed Effects OLS Regressions with logged explanatory variables examining the Impact of Middle Eastern Money on Antisemitic Activity from 2015-2020 using a yearly effect. Variables on antisemitic activity from AMCHA; variables on funding from ISGAP. Standard errors in parentheses. N=1218. ** $p < 0.01$, * $p < 0.05$.

Section 117 Money: Relationship to Antisemitism with Controls

VARIABLES	Total	Targeting	Expression	BDS
Middle East Money (Binary)	1.9827** (0.328)	0.5229** (0.19)	1.0771** (0.182)	0.3826** (0.12)
Non-Middle East Money (Binary)	0.3182 (0.311)	0.106 (0.132)	0.1735 (0.172)	0.0388 (0.114)
Enrollment	4.44e-05** (1.18e-05)	2.311e-05** (5.03e-06)	1.471e-05* (6.54e-06)	6.585e-06 (4.33e-06)
Liberal Arts College	-0.1548 (0.297)	-0.0474 (0.126)	-0.178 (0.164)	0.0707 (0.109)
SJP	2.3944** (0.248)	0.6738** (0.105)	1.18** (0.137)	0.5406** (0.091)
Rank	-0.0197** (0.004)	-0.0052** (0.002)	-0.0107** (0.002)	-0.0037* (0.001)
Constant	0.5115 (0.446)	-0.037 (0.19)	0.3713 (0.247)	0.182 (0.164)

Table 6b. A Fixed Effects OLS regression with logged explanatory variables showing the impact of the presence of Section 117 Funds on Antisemitic Campus Activities, Divided into both Middle Eastern Regimes Hostile to Israel and Non-Middle Eastern Regimes, and Added Control Variables. Coefficients on top show incidence rate ratios, below are coefficients. Standard errors in parentheses. N=1218. ** $p < 0.01$, * $p < 0.05$.

Authoritarian Funds and Antisemitic Incidents

From the observations on the influence of Middle East funding sources, we sought to develop a similar model to test the impacts of authoritarian countries. For this, we isolated funding from the Economist Intelligence Project's top 30 most authoritarian countries in the world from 2017, plus Russia. Having divided funding among 30 most-authoritarian nations and nations not in the top 30, we utilized the same variables as above to assess the significance of authoritarian funds. We found that, whereas authoritarian funding is significant across the board in relation to AMCHA's variables indicating antisemitism or anti-Zionist sentiment, funding from countries who are not in the 30 top authoritarian nations appeared less significant in most of the limited model (Table 7a) but were insignificant in the expanded model with better controls (Table 7b). As in Middle East funding, the presence of SJP chapters registered as similarly significant across the board.

Section 117 Funds: Association with Antisemitism

VARIABLES	Total	Targeting	Expression	BDS
Top 30 Authoritarian Funds (Binary)	2.3538** (0.352)	0.6195** (0.145)	1.146** (0.193)	0.5884** (0.121)
Not in Top 30 Authoritarian Funds (Binary)	2.0000** (0.308)	0.7193** 0.127	1.0086** (0.169)	0.2721* (0.106)
Constant	0.3539 (0.272)	-0.006 (0.112)	0.1362 (0.149)	0.2237* (0.093)

Table 7a. Fixed Effects OLS Regressions examining the Impact of the presence of Authoritarian Money on Antisemitic Activity from 2015-2020 using a yearly effect. Variables on antisemitic activity from AMCHA; binary variables on funding from ISGAP. Standard errors in parentheses. N=1218. ** $p < 0.01$, * $p < 0.05$.

Association of Section 117 Money with Antisemitism: Model with Controls

VARIABLES	Total	Targeting	Expression	BDS
Top 30 Authoritarian Money (Binary)	1.5439** (0.338)	0.3140* (0.143)	0.7384** (0.188)	0.4915** (0.123)
Not in Top 30 Money (Binary)	0.3661 (0.317)	0.1891 (0.135)	0.1532 (0.176)	0.0238 (0.115)
Enrollment	3.815e-05* * (1.17e-05)	2.162e-05** (4.98e-06)	1.218e-05 (6.52e-06)	4.249e-06 4.26e-06
Liberal Arts College	-0.2875 (0.29)	-0.0856 (0.123)	-0.2998 0.161	0.0979 (0.106)
SJP	2.3658** (0.25)	0.6639** (0.106)	1.1743** (0.139)	0.5277** (0.091)
Rank	-0.0213** (0.004)	-0.0056** (0.002)	-0.0121** (0.002)	-0.0036* (0.001)
Constant	0.7254 (0.437)	0.0145 (0.185)	0.5560* (0.243)	0.1550 (0.159)

Table 7b. A Fixed

Effects OLS Regression on the impact of the presence of Section 117 Funds on Antisemitic Campus Activities, Divided into both Authoritarian Regimes Less Authoritarian Regimes, and Added Control Variables. Standard errors in parentheses. N=1218. ** $p < 0.01$.

Study 5: Survey on Relationship of Section 117 Funding to Student Perceptions of Antisemitism

Study 4 showed that Section 117 funding of higher education was associated with increased levels of antisemitic activity on campus as per the AMCHA database. Unfortunately, neither the ADL nor FBI provide data on campus antisemitism per se, and all such individual databases have important limitations. Therefore, Study 5 addressed this issue using an entirely different methodology. Specifically, we conducted a survey of college students at institutions that either did or did not receive Section 117 funding. On that survey, we assessed their experiences with antisemitism on their campus. We then assessed whether Section 117 funding predicted their reported experience with antisemitism.

Methods

Sample

A national survey of college students was conducted by Prolific. 1,816 students nationwide were asked about their experience with antisemitism at their institutions, and 1,760 from 215 colleges and universities completed all measures.

No demographic information beyond whether they were college students was collected (and only college students were included in the sample).

Measures

After answering a few filler questions (such as their views of campus climate), respondents proceeded to five questions assessing their experiences with antisemitism on their campus. Specifically, they were asked:

How frequently is the following sentiment expressed at your university campus or in your classes? (1 never; 2 rarely; 3 sometimes; 4 often)

1. Saying Israel has no right to exist as a Jewish country
2. Drawing comparisons of contemporary Israeli policy to that of the Nazis
3. Saying that the U.S. government only supports Israel because of Jewish money
4. Saying American Jews care more about Israel than the U.S.
5. Boycotting Jewish organizations because they have a connection to Israel

These specific questions were selected because they tap into well-documented antisemitic and anti-Zionist tropes (e.g., Anti-Defamation League, 2023; Burley, 2019; Jussim, Ross, Goldenberg, Finkelstein, Suddhakar; Ramos & Glover, 2023; Kaufman, Shayshon & Levy, 2021; Sunshine, 2019; Tabarovsky, 2022).

Analysis

To analyze the data, we used a Welch's t-test adjusted for unequal variances between responses. We classified the survey response schools based on whether or not they received funds. We then developed a data set with two separate columns for each answer variable, including responses from those that did receive and those that did not receive Section 117 funds. Finally, we used a t-test to determine statistical significance of differences between the means of the two distributions for each question variable. We utilized a Welch's t-test in the stats package in R, because the compared columns contained different variances and different sample sizes, so the degrees of freedom are adjusted accordingly. We plotted the sample means with standard error bars using ggplot in R.

Results

Our first set of analyses compared students' reported experiences with antisemitism among those attending universities that received Section 117 funds ($n=872$) with those from universities that did not ($n=901$). Students at universities receiving Section 117 funding reported hearing all five types of antisemitism significantly more often at colleges and universities that did not (see Figure 2, Table 8).

Outcome:	Section 117 Funding (Mean, SE)	No Section 117 Funding (Mean, SE)	t, df, p-value	Effect size (d)
Israel has no right to exist	1.36 0.02	1.21 0.02	$t(1656.3)=5.65, p<.001$	$d = 0.27$
U.S. supports Israel because of Jewish money	1.24 0.02	1.17 0.02	$t(1731.2)=2.36, p=0.018$	$d = 0.11$
Israelis compared to Nazis	1.23 0.02	1.17 0.02	$t(1727)=2.54, p=0.011$	$d = 0.12$
American Jews care more about Israel than the U.S.	1.24 0.02	1.16 0.02	$t(1706.5)=3.03, p=.003$	$d = 0.14$
Boycott Jewish organizations	1.32 0.02	1.18 0.02	$t(1660.3)= 4.90, p<.001$	$d = 0.23$

Table 8. Welch's t-tests to determine whether responses from individuals from schools receiving Section 117 funding have different means from those that do not receive funding.

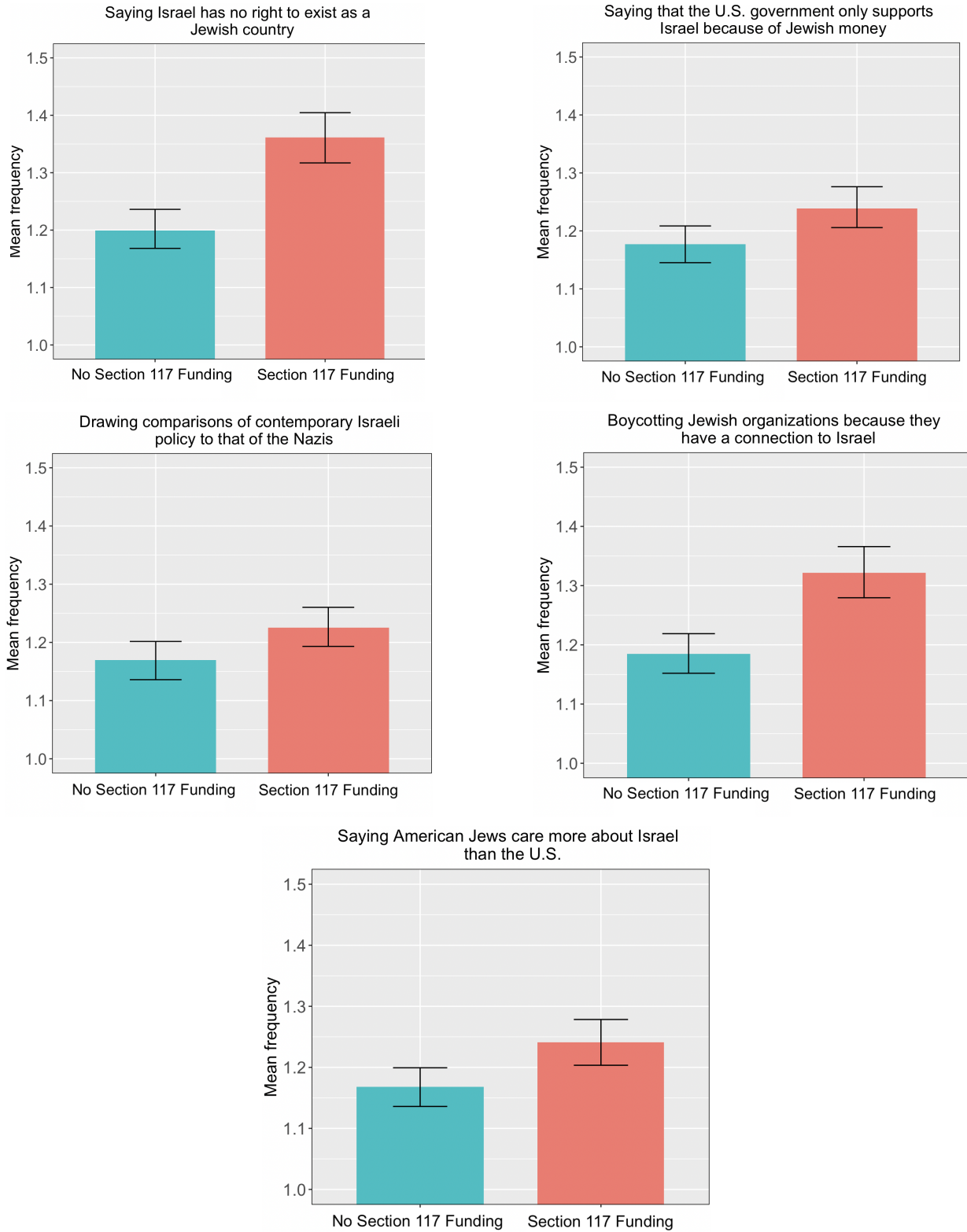


Figure 2. Mean frequency refers to the frequency with which students reported having heard the antisemitic statements shown. Students from institutions that report Section 117 funding reported hearing significantly more antisemitic statements than students at institutions which do not report Section 117 funding.

Study 6: Antisemitism From Computer to Campus and from Campus To County

Might campus antisemitic activity be upstream of broader antisemitic trends and how does it interact with social media trends, which are known to be highly relevant to young adults? One possibility is that Section 117 funds on campuses could lead to changes in antisemitic campus and youth culture, which could then lead to a spill out effect from campus to county. These same changes in youth culture, might “sensitize” students to respond more strongly to high-valence social media activity. To better understand these relationships we set out to examine 2 hypotheses: That campus antisemitism precedes and predicts antisemitism in the surrounding county and that antisemitic reactivity is higher in campuses receiving Section 117 funds when high valence social media activity targeting Israel is present.

Methods

FBI Data on Antisemitic Hate Crimes

The FBI data on hate crimes against Jews from 2015-2020 was downloaded from the Uniform Crime Reporting database, which has maintained data on hate crimes since 1991. In 2021, the FBI counted 11,834 reporting agencies, including federal, metropolitan, state, and county jurisdictions. Some universities reported hate crimes, but few classroom incidents reported by AMCHA are assessed as FBI criminal reports, so the two can be taken as distinct datasets in the modeling environment.

AMCHA Data on Antisemitic Expression and Targeting

AMCHA-reported incidents were downloaded from their website and integrated into a daily time series table with FBI reports using INDEX and MATCH functions in Excel. As described above, the Expression incidents feature expressions of antisemitic beliefs in the classroom, whereas Targeting incidents indicate the picking out of a specific person or group because of their Jewishness.

Results

Preliminary Analyses

Table 9a summarizes the FBI and AMCHA data on antisemitism in time series datasets documenting discrete incidents of campus antisemitism (AMCHA) and hate crimes against Jews (FBI). Table 9b summarizes the Twitter data on “#israelapartheid” and the antisemitic incidents at institutions that did versus those that did not receive Section 117 funding from Middle East sources.

	Total	Mean	Maximum	Median
FBI	5,070	2.31	17	2
AMCHA (Expression)	1,794	0.82	18	0
AMCHA (Targeted)	1,384	0.63	22	0

Table 9a: Summary statistics for antisemitism over time, from 2015-2020

	Total	Mean	Maximum	Median
“Apartheid” on Twitter	3,144,522.5	1,434.5	13,434	1,234
Incidents at institutions that received funding from Middle East Sources	759	0.83	32	0
Incidents at institutions that did not receive funding from Middle East Sources	804	0.88	70	0

Table 9b: Descriptive Statistics on Twitter data and antisemitic incidents data.

Does Antisemitism on Campus Predict Antisemitism in the Surrounding County?

We set out to examine the relationship between FBI reported hate crimes against Jews and campus specific antisemitic incidents to determine whether one is useful in forecasting the other. To do so, we deployed Granger Causality, a statistical time-series analysis which includes lagged variables. First we ran Augmented Dickey Fuller unit root tests to ensure that the time series data was not stationary, and in every case, that proved true. Then, we ran vector autoregression tests to assess appropriate lag values, settling on Akaike information criterion (AIC) as the best goodness of fit. We further examined daily time series data for the term “#israelapartheid” on Twitter in relation to expressed and targeted antisemitic incidents on campus from January 1, 2020 to June 30, 2022. Splitting up the daily counts of incidents between whether they happened on universities that did and did not receive funding, we obtained daily counts of incidents based on the origin of funding (Figure 2).

The key Granger Causality results are shown in Table 10. In the years 2015-2020 targeted instances of antisemitism on campus appear to forecast FBI-reported hate crimes ($p < 0.001$), and vice versa ($p = 0.004$), suggesting these trends influence one another. However, we found that non-targeted expressions of antisemitism such as slogans, graffiti or flyers help forecast FBI reported hate crimes against Jews ($p = 0.05$), and not the other way around (Figure 3). These findings suggest that the expression of antisemitic graffiti, slogans and fliers on campus may be upstream indicators for broader, county-level trends in antisemitic hate crimes recorded by the FBI.

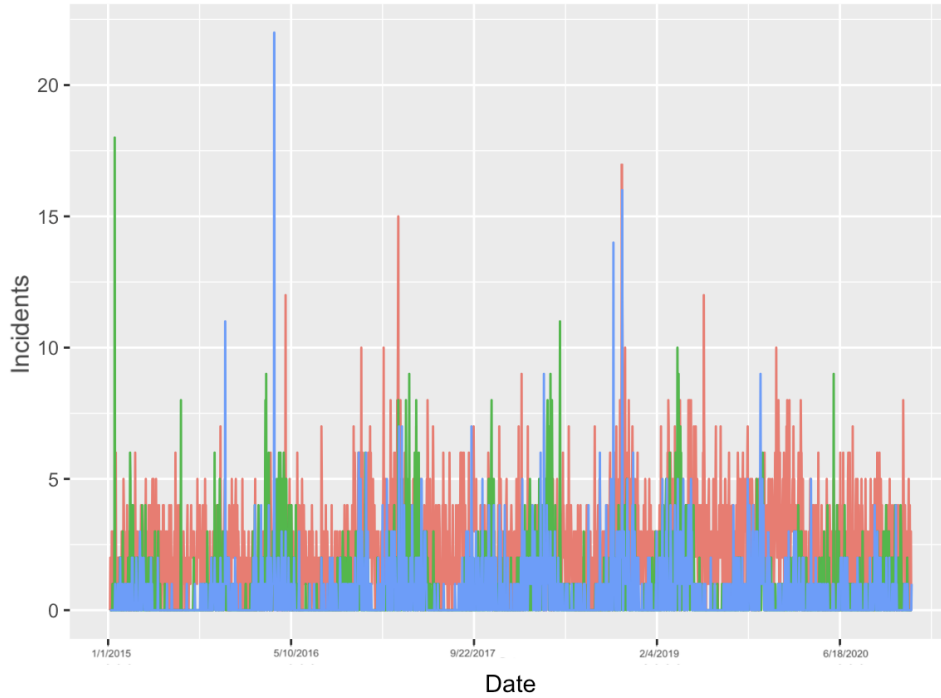


Figure 2. Trace activity from 2015-2020 of FBI hate crimes and campus (targeted and non-targeted antisemitic incidents) by week. The expression of antisemitism on campus (green) and targeted antisemitism on campus (blue) often precedes FBI reported antisemitic hate crimes (red).

	Caused by FBI Reported Hate Crimes Against Jews	Causes FBI Reported Hate Crimes Against Jews	Caused by ADL Reported Antisemitic Incidents	Causes ADL Reported Antisemitic Incidents
Campus Targeted Incidents	$p = 0.0027^{**}$	$p < 0.0001^{**}$	$p = 0.0915$	$p = 0.8639$
Campus Antisemitic Expression	$p = 0.179$	$p = 0.039^{**}$	$p = 0.9942$	$p = 0.8918$

Table 10. Granger causality analysis shows that campus targeted incidents and regional antisemitic hate crimes follow from one another, but expression of antisemitism in the form of fliers, slogans or graffiti appears as an early indicator for antisemitic hate crimes as reported by the FBI (January 2015-December 2020) and the ADL (November 2019-December 2020). $** p < 0.01$, $* p < 0.05$

We next sought to understand how social media activity might correlate with antisemitic activity on campus and how concealed funding might play in such a relationship. We thus further developed another time series with the same range, this time incorporating data including Twitter posts including the hashtag “#Israelapartheid”, alongside two variables including the quantity of antisemitic incidents on campus recorded by AMCHA divided into those that received and those that did not receive Section 117 funding. Using a negative binomial count model to account for overdispersion regarding the different source groups as independent variables, we found campus antisemitic activity was correlated to the use of the Twitter hashtag at significant levels but the effect size was larger in schools that received undisclosed funding (Table 11).

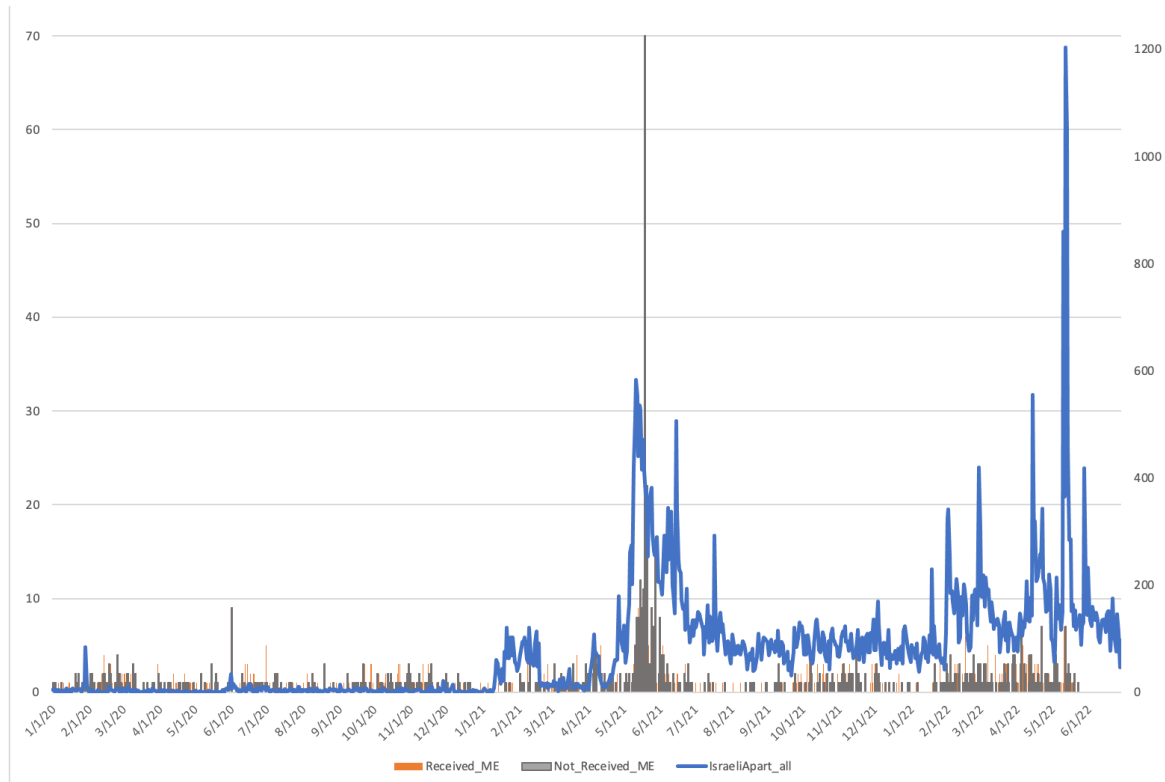


Figure 3. Daily incidents from institutions of higher learning that did (orange) and did not (gray) receive Section 117 funding in relation to the trends of “#IsraeliApartheid” on Twitter (secondary axis, blue line).

Funds from Middle East Regimes and Antisemitic Incidents

Dependent variable:

	#IsraeliApartheid Count (1)
Daily count of antisemitic incidents at Universities that Received Section 117 Funds	0.23** (0.06)
Daily count of antisemitic incidents at Universities that Did Not Receive Section 117 Funds	0.04 (0.03)
Constant	4.00** (0.006)
Observations	911
Log Likelihood	-4,511.2
Akaike Inf. Crit.	9,030.4

Standard errors in parentheses

** $p < 0.01$, * $p < 0.05$

Table 11. Negative Binomial Regression on the correlation between daily counts of #IsraeliApartheid on Twitter with antisemitic incidents that occurred in institutions of higher learning that received funding and in those that did not on the same day.

Our findings support the hypothesis that campus institutional antisemitism does not remain isolated to the university, but impacts broader regional activity, spilling out from campus to county. Furthermore, our findings indicate that undisclosed funding tends to create more amenable conditions for antisemitic incidents to conjoin with high valence online signaling.

General Discussion

In this report, we explored ways in which Section 117 funding received by colleges and universities predicts both antisemitism and the erosion of liberal democratic norms around suppression of speech. Key findings include:

1. Major institutions of higher learning in the U.S. received billions of dollars from foreign regimes, with significant contributions from Middle Eastern and Authoritarian regimes. Substantial portions of this funding were previously unreported.
2. Receipt of Section 117 funding was related to:
 - a. an illiberal environment on campuses, in which scholars and campus speakers were more likely to be targeted for punishment by activist campaigns.
 - b. reports of exposure to both antisemitic rhetoric and the demonization of Israel.
 - c. higher levels of antisemitic acts on campus—a relationship that was even stronger if the Section 117 funding came from countries in the Middle East

3. Section 117 funding predicted the relationship between social media signals on Twitter and antisemitic reactivity on campus.

Limitations and Directions for Future Research

As the first large-scale and data-driven report that links these factors this work has notable limitations. Because our analyses were entirely correlational, we cannot make clear claims about causal directions. Whether illiberal campuses attract Section 117 funding, Section 117 funding causes illiberalism, some third variable (such as university status) causes both, or some combination of causes combine in complex ways cannot be determined by our analyses. Identifying causal directions is an important area for future research.

The present research also did not assess why some of the funding went unreported for years, until the U.S. Department of Education began deliberations for conducting an investigation. Therefore, whether this occurred because of innocent oversights, managerial incompetence, overly complex bureaucratic reporting requirements, political agendas, or corruption – or some combination of these or other reasons – was not determined by the present research. Indeed, it is possible that foreign funding went unreported for different reasons at different institutions. The purpose of the present research was to investigate social and political phenomena related to receipt of Section 117 funding; its purpose was not to investigate how or why some of it initially went unreported.

Another limitation is that we only examined relations of receipt of total funds eventually reported under Section 117 from foreign sources with manifestations of illiberalism. But those total funds could be divided into two pools: 1. Funds initially received and transparently reported; 2. Funds that went unreported until the DOE began deliberating investigations in institutions of higher education for failing to report all foreign funding required under Section 117. Whether transparently reported funding is associated with liberal democratic norms around speech and antisemitism in a manner that differs from initially unreported funding was not addressed in the current report. Regardless, without direct comparisons of how documented versus previously unreported funding relates to illiberalism, no conclusions are justified on the basis of this report regarding whether receipt of previously unreported funding is more or less strongly associated with illiberal campus developments. Such comparisons would be invaluable in future research.

As the first investigation (of which we are aware) or how receipt of Section 117 funds relates to campus liberal democratic norms, the present research was exploratory, rather than confirmatory. Therefore, all findings should be viewed as introductory and a first step to further research on this topic by other social science teams.

Finally, though a significant portion of funds were previously undisclosed, we did not break out money that was disclosed in a timely fashion, vs funding that was previously undisclosed by universities to examine differences in outcomes for campus antisemitism or polarization with such funds specifically. Future research is under preparation to itemize these and segregate these discrepancies to analyze differential outcomes.

Implications, Speculations, and Future Research

This report raises the sobering possibility that international actors are using undisclosed channels to funnel large amounts of money into college campuses (including elite institutions that often have outsized influence on American culture and politics) for purposes harmful to the democratic norms of pluralism, tolerance, and freedom. There clearly has been an erosion of democratic norms on campuses (self-censorship; censorship by scientists; disinvitations rising; abandonment of free speech/academic freedom by academics). These developments are surely complex and multiply determined. One possibility, however, is that receipt of Section 117 funding from foreign sources, especially authoritarian ones, has contributed to these developments.

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APPENDIX 1: Institutional level

<u>Institutions</u>	<u>Funding</u>
Carnegie Mellon University	1,473,036,665
Cornell University	1,289,433,376
Harvard University	894,533,832
Massachusetts Institute of Technology	859,071,692
Texas A&M University	521,455,050
Yale University	495,851,474
Northwestern University	402,316,221
Johns Hopkins University	401,035,647
Georgetown University	379,950,511
University of Chicago (The)	364,544,338
University of Colorado Boulder	345,389,137
Duke University	343,699,498
Brigham Young University	323,509,863
Stanford University	319,561,362
University of Texas MD Anderson Cancer Center	301,527,419
University of Southern California	297,018,636
Columbia University in the City of New York	295,506,012
University of California, Berkeley	294,229,904
University of Pennsylvania	292,730,761
University of Michigan - Ann Arbor	287,336,783
New York University	263,120,883
University of California, Los Angeles	241,330,072
Northeastern University	209,612,629
Boston University	208,481,283
George Washington University	157,668,354
University of Phoenix	155,070,846

California Institute of Technology	150,183,084
University of California, San Diego	131,941,755
Rice University	127,016,688
Arizona State University	112,606,405
Princeton University	107,855,430
University of Illinois at Urbana-Champaign	103,351,540
University of Washington - Seattle	90,202,451
Virginia Commonwealth University	89,163,583
University of Arkansas	86,632,281
University of Texas at Austin	85,858,408
Georgia Institute of Technology	77,979,361
Purdue University	75,504,368
Indiana University - Purdue University Indianapolis	73,313,006
Williams College	73,110,507
San Diego State University	71,121,817
Rutgers, the State University of New Jersey	59,294,927
Ohio State University (The)	58,277,670
Dartmouth College	54,451,481
University of Delaware	52,031,064
Oregon Health & Science University	51,804,595
University of Arizona (The)	49,219,296
University of Pittsburgh	49,024,123
Indiana University - Bloomington	48,487,128
Saint John's University	47,634,332
University of Notre Dame	46,652,439
University of Maryland, Baltimore	46,606,037
Temple University	46,121,994
Vanderbilt University	45,581,221
University of California, San Francisco	45,376,390

New York Institute of Technology	44,646,055
George Mason University	44,320,257
Babson College	43,776,133
Pennsylvania State University (The)	43,458,897
University of Iowa	43,285,554
University of California, Irvine	42,961,430
University of North Carolina - Chapel Hill	41,292,544
Boise State University	40,255,604
Tufts University	40,126,640
School of the Art Institute of Chicago	40,003,260
Kean University	39,148,779
Western International University	38,826,482
Eastern Washington University	37,532,091
Chamberlain University	37,093,314
Boston College	36,654,370
Whittier College	36,237,000
Emory University	36,100,743
Brown University	34,839,308
University of Kansas	33,560,295
University of Minnesota - Twin Cities	32,947,045
Ball State University	32,334,248
University of California, Davis	32,028,791
Washington University in St. Louis	30,996,146
Kansas State University	30,879,041
DePaul University	29,528,842
University of California, Santa Barbara	28,640,020
University of Colorado Denver	28,393,144
Oregon State University	26,357,408
University of Oklahoma	25,725,486

Central Michigan University	25,175,713
University of Kentucky	24,971,560
Rensselaer Polytechnic Institute	24,924,830
Colorado State University	23,985,191
Washington State University	23,975,181
North Carolina State University	23,762,788
University of Alabama	23,626,197
University of Wisconsin - Madison	22,945,761
University of Virginia	22,189,238
Drexel University	21,828,454
California State University, East Bay	21,128,003
Chapman University	20,956,280
Teachers College, Columbia University	20,817,997
University of Miami	18,745,285
West Virginia University	18,509,865
Syracuse University	18,050,730
University of Toledo	17,963,388
University of Georgia	17,797,759
Wichita State University	17,287,541
Johnson & Wales University	16,367,685
Western Michigan University	15,914,064
Juilliard School (The)	15,238,905
University of Louisville	15,088,506
Spartan College of Aeronautics and Technology	13,368,010
Iowa State University of Science & Technology	13,211,508
University of Rochester	13,068,703
Mayo Clinic College of Medicine and Science	12,702,624
Ohio University	12,648,082
University of New Hampshire	12,252,707

University of Texas at Dallas	12,239,876
Virginia Polytechnic Institute & State University	11,792,062
University of Florida	11,464,228
University of Hawaii at Manoa	11,235,118
Northwood University	11,159,755
University of Texas at Arlington	10,900,984
Hult International Business School	10,693,624
University of California, Riverside	10,500,404
Curtis Institute of Music	10,000,000
MCPHS University	9,954,332
University of Colorado Colorado Springs	9,293,748
Texas Tech University	9,267,686
University of New Haven	9,206,730
Michigan State University	9,154,652
Soka University of America	9,113,797
University of Oregon	9,026,834
California State University, Fresno	8,854,772
University of Missouri - Columbia	8,604,797
University of South Alabama	8,537,196
California State Polytechnic University, Pomona	8,163,467
Winthrop University	8,109,782
University of Houston	8,095,807
University of Texas Health Science Center at Houston	7,565,896
University of Alabama at Birmingham	7,190,988
Loyola University Chicago	7,148,217
Miami University	6,927,637
University of Denver	6,850,876
Missouri University of Science and Technology	6,721,969
University of Connecticut	6,697,718

University of Utah	6,551,764
University of Tennessee	6,458,377
Rochester Institute of Technology	6,421,819
New School, The	6,282,174
Culinary Institute of America	6,045,827
Missouri State University	5,979,661
University of Texas Southwestern Medical Center (The)	5,900,144
Berkeley College	5,899,803
Campbellsville University	5,750,133
University of Missouri - Kansas City	5,697,739
Haverford College	5,554,548
California State University, Los Angeles	5,409,852
University of North Texas	5,283,725
University of California, Santa Cruz	5,215,319
University of Dayton	5,183,399
Indiana University of Pennsylvania	5,153,291
University of Cincinnati	5,145,711
Wake Forest University	5,026,211
Saint Louis University	5,020,233
Clemson University	4,912,287
North Dakota State University - Fargo	4,848,361
California State University, Fullerton	4,644,036
California State University Maritime Academy	4,619,004
Biola University	4,463,027
California State University, San Bernardino	4,452,375
University of Nebraska at Omaha	4,324,674
Indiana State University	4,291,189
University of Tulsa (The)	4,264,346
Albert Einstein College of Medicine	4,252,385

Midwestern State University	4,200,000
University of Northern Iowa	4,117,945
University of Maryland, College Park	3,919,324
Berklee College of Music	3,750,000
Claremont McKenna College	3,749,803
University of Vermont and State Agricultural College	3,665,489
Rush University	3,613,341
American University (The)	3,489,000
Keck Graduate Institute of Applied Life Sciences	3,454,342
College of William & Mary	3,384,498
University of Texas Health Science Center at San Antonio	3,298,546
CUNY Bernard M. Baruch College	3,201,465
New Jersey Institute of Technology	3,187,199
California State University, Northridge	2,881,586
Graceland University	2,873,580
Jacksonville University	2,838,302
Columbia College Chicago	2,770,210
Alfred University	2,711,699
Barnard College	2,700,000
Middlebury College	2,689,528
DigiPen Institute of Technology	2,547,978
California State University, Bakersfield	2,366,777
Lamar University	2,308,232
Pace University	2,264,746
Kent State University	2,214,473
Gonzaga University	2,189,779
Keuka College	2,177,417
Gustavus Adolphus College	2,107,800
Bryant University	2,063,621

New Mexico State University	2,045,147
Regis College	2,000,000
Erikson Institute	1,985,034
Hawaii Pacific University	1,896,240
University of Missouri - Saint Louis	1,890,492
Worcester Polytechnic Institute	1,866,477
University of Texas at San Antonio	1,864,375
University of Nebraska Medical Center	1,845,055
California State University, Chico	1,840,398
University of Nebraska	1,760,841
Wright State University	1,693,644
California Institute of Advanced Management	1,675,000
University of Idaho	1,672,208
Smith College	1,610,875
Washington Adventist University	1,581,497
Southern New Hampshire University	1,564,566
University of Illinois at Chicago	1,557,227
Westmont College	1,500,000
Rhode Island School of Design	1,500,000
Westminster Theological Seminary	1,467,620
Auburn University Montgomery	1,419,838
University of Wyoming	1,386,651
Middle Tennessee State University	1,369,959
University of Northern Colorado	1,309,306
Niagara University	1,300,858
University of Massachusetts - Amherst	1,273,915
University of North Texas Health Science Center at Fort Worth	1,261,996
Pomona College	1,255,000
Wellesley College	1,243,736

Northern Illinois University	1,223,418
University of Indianapolis	1,189,518
University of Maine	1,175,469
St. Lawrence University	1,152,300
Kennesaw State University	1,119,364
California State University, Long Beach	1,107,987
Midway University	1,057,500
Michigan Technological University	1,025,590
Presidio Graduate School	1,000,002
Lawrence University of Wisconsin	999,977
California State University, San Marcos	992,445
Northern Arizona University	949,163
Moravian College	947,401
Marian University	931,000
California State University - Sacramento	915,732
Northeastern State University	898,471
Valparaiso University	885,690
Des Moines Area Community College	883,435
Stevens Institute of Technology	805,306
Bucknell University	788,432
Amherst College	778,723
Oral Roberts University	764,059
Tulane University	750,188
Xavier University of Louisiana	706,193
Santa Clara University	686,943
University of Tennessee Health Science Center	681,000
Cornell College	655,662
Cleveland State University	655,027
United States Sports Academy	590,000

University of Mississippi	587,636
Towson University	560,951
Columbia Southern University	545,720
Bentley University	535,342
Wesleyan College	500,000
Adelphi University	500,000
Swarthmore College	500,000
University of the South (The)	500,000
Troy University	463,657
Missouri Southern State University	461,603
Murray State University	436,999
Rose - Hulman Institute of Technology	432,277
Young Americans College of the Performing Arts (The)	421,583
Norwich University	394,566
University of Akron (The)	392,822
Georgia Southern University	364,000
San Jose State University	357,370
Corban University	350,000
San Francisco State University	345,653
University of North Carolina - Charlotte	326,486
University of Hawaii at Hilo	320,000
Brandeis University	300,000
University of Portland	300,000
Wayne State University	299,895
California State University, Dominguez Hills	299,605
Yeshiva University	297,397
Marquette University	295,048
Villanova University	264,466
Bates College	250,000

Beth Medrash Govoha of America	250,000
Jacksonville State University	250,000
University of California, Merced	182,514
University of Central Oklahoma	160,288
Metropolitan State University	136,657
University of Jamestown	500

APPENDIX 2: County Level

<u>County, State</u>	<u>Section 117 Funds</u>
Middlesex, Massachusetts	1,832,921,876
Allegheny, Pennsylvania	1,522,060,788
Tompkins, New York	1,289,433,376
Cook, Illinois	851,481,656
New York, New York	615,329,382
Los Angeles, California	559,281,402
District of Columbia, District of Columbia	541107865
Brazos, Texas	521455050
New Haven, Connecticut	505058204
Harris, Texas	444205810
Suffolk, Massachusetts	423117827
Baltimore County, Maryland	401596598
Philadelphia, Pennsylvania	370681209
Boulder, Colorado	345389137
Durham, North Carolina	343699498
Utah, Utah	323509863
Santa Clara, California	320605675

Alameda, California	315357907
Maricopa, Arizona	306503733
Washtenaw, Michigan	287336783
Merced, California	241330072
Santa Barbara, California	133441755
Mercer, New Jersey	107855430
Champaign, Illinois	103351540
King, Washington	92750429
Richmond City, Virginia	89163583
Washington, Arkansas	86632281
Travis, Texas	85858408
San Diego, California	82797180
San Francisco, California	78750836
Fulton, Georgia	77979361
Tippecanoe, Indiana	75504368
Worcester, Massachusetts	74976984
Marion, Indiana	74244006
Middlesex, New Jersey	59294927
Franklin, Ohio	58277670
St. Louis County, Missouri	54971327
Providence, Rhode Island	54770614
Grafton, New Hampshire	54451481
Multnomah, Oregon	52104595
New Castle, Delaware	52031064
Pima, Arizona	49219296
Hampshire, Massachusetts	48995635
Monroe, Indiana	48487128
Queens, New York	47634332
St. Joseph, Indiana	46652439

Davidson, Tennessee	45581221
Nassau, New York	45146055
Johnson, Iowa	44475072
Fairfax County, Virginia	44320257
Norfolk, Massachusetts	43776133
Centre, Pennsylvania	43458897
Buncombe, North Carolina	41292544
Ada, Idaho	40255604
Spokane, Washington	39721870
Union, New Jersey	39148779
DeKalb, Georgia	36100743
Denver, Colorado	35380677
Orange, California	34714113
Douglas, Kansas	33560295
Hennepin, Minnesota	32947045
Delaware, Indiana	32334248
Riley, Kansas	30879041
Santa Cruz, California	28640020
Benton, Oregon	26357408
Cleveland, Oklahoma	25725486
Isabella, Michigan	25175713
Fayette, Kentucky	24971560
Albany, New York	24924830
Larimer, Colorado	23985191
Wake, North Carolina	23762788
Madison, Alabama	23626197
Dane, Wisconsin	22945761
Albemarle, Virginia	22189238
Monroe, New York	19490522

Miami-Dade, Florida	18745285
Monongalia, West Virginia	18509865
Tulsa, Oklahoma	18396415
Dallas, Texas	18140020
Onondaga, New York	18050730
Lucas, Ohio	17963388
Clarke, Georgia	17797759
Wichita, Kansas	17287541
Kalamazoo, Michigan	15914064
Jefferson, Kentucky	15088506
Story, Iowa	13211508
Olmsted, Minnesota	12702624
Athens, Ohio	12648082
Strafford, New Hampshire	12252707
Tarrant, Texas	12162980
Montgomery, Ohio	11881117
Montgomery, Virginia	11792062
Alachua, Florida	11464228
Midland, Michigan	11159755
Worcester, Maryland	9954332
El Paso, Colorado	9293748
Lubbock, Texas	9267686
Ingham, Michigan	9154652
Lane, Oregon	9026834
Fresno, California	8854772
Boone, Missouri	8604797
Mobile, Alabama	8537196
York, South Carolina	8109782
Hamilton, Ohio	7545548

Butler, Ohio	6927637
St. Louis City, Missouri	6910725
Phelps, Missouri	6721969
Salt Lake, Utah	6551764
Hamilton, Tennessee	6458377
Delaware, Pennsylvania	6054548
Greene, Missouri	5979661
Casey, Kentucky	5750133
Jackson, Oregon	5697739
Denton, Texas	5283725
Yolo, California	5215319
Bexar, Texas	5162921
Indiana, Pennsylvania	5153291
Forsyth, North Carolina	5026211
Pickens, South Carolina	4912287
Cass, North Dakota	4848361
Solano, California	4619004
San Bernardino, California	4452375
Clark, Nevada	4324674
Bronx, New York	4252385
Wichita, Texas	4200000
Black Hawk, Iowa	4117945
Prince George's, Maryland	3919324
Chittenden, Vermont	3665489
Williamsburg, Virginia	3384498
Essex, New Jersey	3187199
Calhoun, Alabama	3088302
Decatur, Iowa	2873580
Montgomery, Pennsylvania	2854271

Allegany, New York	2711699
Addison, Vermont	2689528
Kern, California	2366777
Jefferson, Texas	2308232
Portage, Ohio	2214473
Yates, New York	2177417
Nicollet, Minnesota	2107800
Doña Ana, New Mexico	2045147
Douglas, Nebraska	1845055
Butte, California	1840398
Lancaster, Nebraska	1760841
Middlesex, Connecticut	1743736
Latah, Idaho	1672208
Montgomery, Maryland	1581497
Merrimack, New Hampshire	1564566
Montgomery, Alabama	1419838
Rutherford, Tennessee	1369959
Weld, Colorado	1309306
Niagara, New York	1300858
DeKalb, Illinois	1223418
Spotsylvania, Virginia	1175469
St. Lawrence, New York	1152300
Baldwin, Alabama	1135720
Cobb, Georgia	1119364
Woodford, Kentucky	1057500
Houghton, Michigan	1025590
Outagamie, Wisconsin	999977
Coconino, Arizona	949163
Northampton, Pennsylvania	947401

Sacramento, California	915732
Porter, Indiana	885690
Des Moines, Iowa	883435
Hudson, New Jersey	805306
Union, Pennsylvania	788432
Orleans, Louisiana	750188
Fayette, Tennessee	681000
Linn, Iowa	655662
Cuyahoga, Ohio	655027
Lafayette, Mississippi	587636
Marion, Tennessee	500000
Newton, Missouri	461603
Calloway, Kentucky	436999
Washington, Vermont	394566
Marion, Oregon	350000
Orange, North Carolina	326486
Ventura, California	300000
Wayne, Michigan	299895
Milwaukee, Wisconsin	295048
Chautauqua, New York	264466
Ocean, New Jersey	250000
Androscoggin, Maine	250000
Oklahoma, Oklahoma	160288
Stutsman, North Dakota	500

APPENDIX 3: PROLIFIC SURVEY

INSTITUTION WITH SEC. 117 FUNDING	RESPONSES
University of Houston	20
Purdue University	17
Arizona State University	17
Pennsylvania State University	15
Southern New Hampshire University	14
University of California, San Diego	13
University of Michigan, Ann Arbor	13
University of Georgia	13
University of Tennessee	12
University of Maryland, College Park	12
University of Pittsburgh	11
Temple University	11
University of Washington	11
University of Kentucky	10
The Ohio State University	10
Rutgers University	10
Georgia Institute of Technology	10
University of North Texas	9
University of California, Los Angeles	9
University of Virginia	9
University of Arizona	9
University of North Carolina, Chapel Hill	9
University of Illinois, Urbana Champagne	9
University of Illinois, Chicago	9
Oregon State University	9

New York University	9
Northeastern University	9
University of Wisconsin, Madison	8
Texas A&M University	8
University of Rochester	8
University of Minnesota, Twin Cities	8
University of Texas, Austin	8
University of California, Berkeley	8
University of California, Irvine	8
Ohio State University	8
Miami University	8
University of Florida	7
University of Cincinnati	7
Texas Tech University	7
University of Massachusetts, Amherst	7
Boston University	7
California State University, Fullerton	7
West Virginia University	6
Washington University, St. Louis	6
University of California, Davis	6
University of North Carolina, Charlotte	6
Wayne State University	6
University of Connecticut	6
University of Delaware	6
University of Southern California	6
San Francisco State University	6
North Carolina State University	6
Kennesaw State University	6
Indiana University	6

George Washington University	6
DePaul University	6
Indiana University Purdue University Indianapolis	6
Towson University	5
Virginia Polytechnic Institute and State University	5
University of California, Riverside	5
University Of Nebraska, Omaha	5
University of Iowa	5
Texas A&M University-College Station	5
San Diego State University	5
Loyola University Chicago	5
San Jose State University	5
American University	5
Columbia University	5
Iowa State University	5
California State University, Long Beach	5
Drexel University	5
California State University, Northridge	5
Johns Hopkins University	5
Colorado State University	5
University of Pennsylvania	4
University of Toledo	4
University of Akron	4
University of California, Santa Cruz	4
University of Notre Dame	4
Syracuse University	4
Virginia Commonwealth University	4
University of Texas, Arlington	4
University of Kansas	4

University of Texas, San Antonio	4
University of Texas at Austin	4
Yale University	4
Ohio University	4
Rice University	4
Middle Tennessee State University	4
Michigan State University	4
Cornell University	4
Boston College	4
Georgia Southern University	4
Brown University	4
University of Northern Iowa	3
University of Texas, Dallas	3
Washington State University	3
University of Vermont	3
University of Colorado, Boulder	3
The University of Texas, Austin	3
University of Nebraska, Lincoln	3
University of Oregon	3
University of Miami	3
University of Colorado, Denver	3
University of California, Santa Barbara	3
Vanderbilt University	3
Villanova University	3
University of Missouri, Columbia	3
Marquette University	3
Rensselaer Polytechnic Institute	3
Northern Illinois University	3
Northwestern University	3

Stanford University	3
George Mason University	3
Ball State University	3
Central Michigan University	3
Duke University	3
Brigham Young University	3
Harvard University	3
Kansas State University	3
University of Arkansas	2
University of Texas at San Antonio	2
University of Portland	2
University of Chicago	2
University of Wyoming	2
University of Dayton	2
University of Phoenix	2
University of Denver	2
University of California Berkeley	2
University of Indianapolis	2
Tufts University	2
The College of William and Mary	2
University of Alabama, Birmingham	2
The New School	2
Wichita State University	2
The University of Texas, Arlington	2
University of Oklahoma	2
Murray State University	2
Pace University	2
Missouri State University	2
Michigan Technological University	2

St John's University	2
Rochester Institute of Technology	2
New York Institute of Technology	2
Kent State Univeristy	2
Northern Arizona University	2
Indiana University of Pennsylvania	2
Clemson University	2
California State University, San Marcos	2
Baruch College	2
Cleveland State University	2
Boise State University	2
Georgetown University	2
University of Utah	1
Williams College	1
University of California, Merced	1
The University of Akron	1
University of Maine, Orono	1
University of Hawaii, Manoa	1
University of Central Oklahoma	1
Worcester Polytechnic Institute	1
Western Michigan University	1
University of Hawaii, Manoa	1
University of Texas Health Science Center, San Antonio	1
University Of Colorado, Colorado Springs	1
Tulane University	1
Wright State University	1
University of Maryland, Baltimore	1
University of Louisville	1
Wake Forest University	1

University of Tennessee at Knoxville	1
Wellesley College	1
University of Texas	1
Yeshiva University	1
University of Texas at Dallas	1
University of New Hampshire	1
University of Maine	1
Xavier University	1
Loyola University Chicago School of Law	1
Smith College	1
Oxford College of Emory University	1
Missouri University of Science and Technology	1
Missouri Southern State University	1
Lamar University	1
Massachusetts Institute of Technology	1
New Jersey Institute of Technology	1
School of the Art Institute Chicago	1
Massachusetts College of Pharmacy and Health Sciences	1
Middlebury College	1
Saint Louis University	1
St Lawrence University	1
Oregon Health & Science University	1
San Francisco State University	1
Keck Graduate Institute	1
Bucknell University	1
Columbia College Chicago	1
California Institute of Technology	1
California State University, Chico	1
Auburn University Montgomery	1

Kean University	1
City University of New York Bernard M Baruch College	1
Gustavus Adolphus College	1
California State Polytechnic University, Pomona	1
Haverford College	1
California State University, Bakersfield	1
Brandeis University	1
California State University, Dominguez Hills	1
Adelphi University	1
California State University, East Bay	1
Indiana University Bloomington	1
California State University, Los Angeles	1
Indiana University Purdue University of Indianapolis	1
California State University, Sacramento	1
California State University, San Bernardino	1
Jacksonville University	1