UNIVERSITY EXPORT CONTROL PROGRAM (UECP)

Providing export control guidance to safeguard research and other University activities

THE UNIVERSITY OF ARIZONA

What do you need to know?

You'll be able to identify:

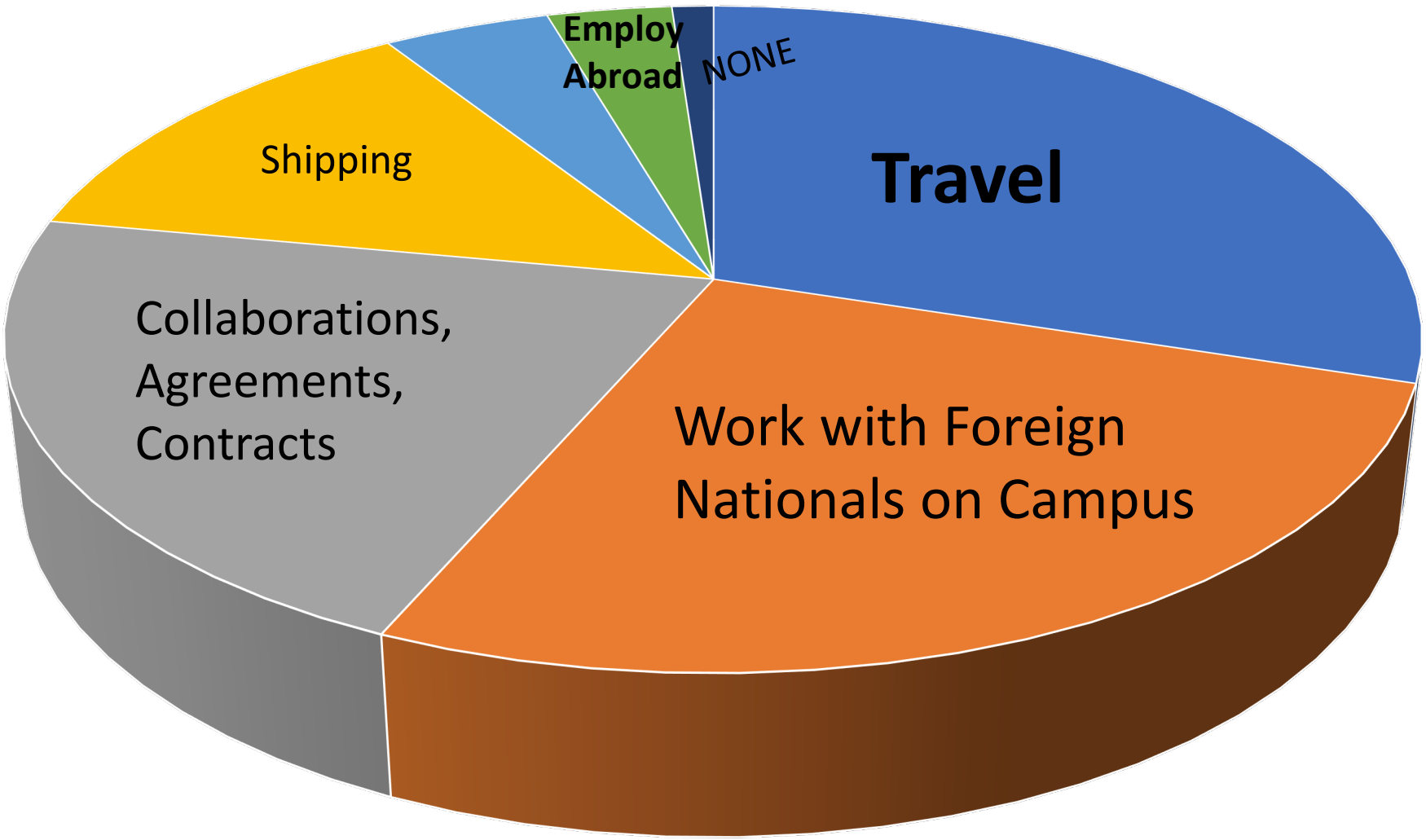
- University activities impacted by export control regulations.
- When to add Restricted Party Screening (RPS) to your processes
- When to contact UECP.

Activities with Export Control Implications

- **Conducting research**
- **International travel**
- Publishing research
- Procurement

- International shipments
- Hiring/sponsoring foreign persons
- Collaborations with non-U.S. individuals, universities, or entities
- Non-disclosure agreements & Contracts

International Activities

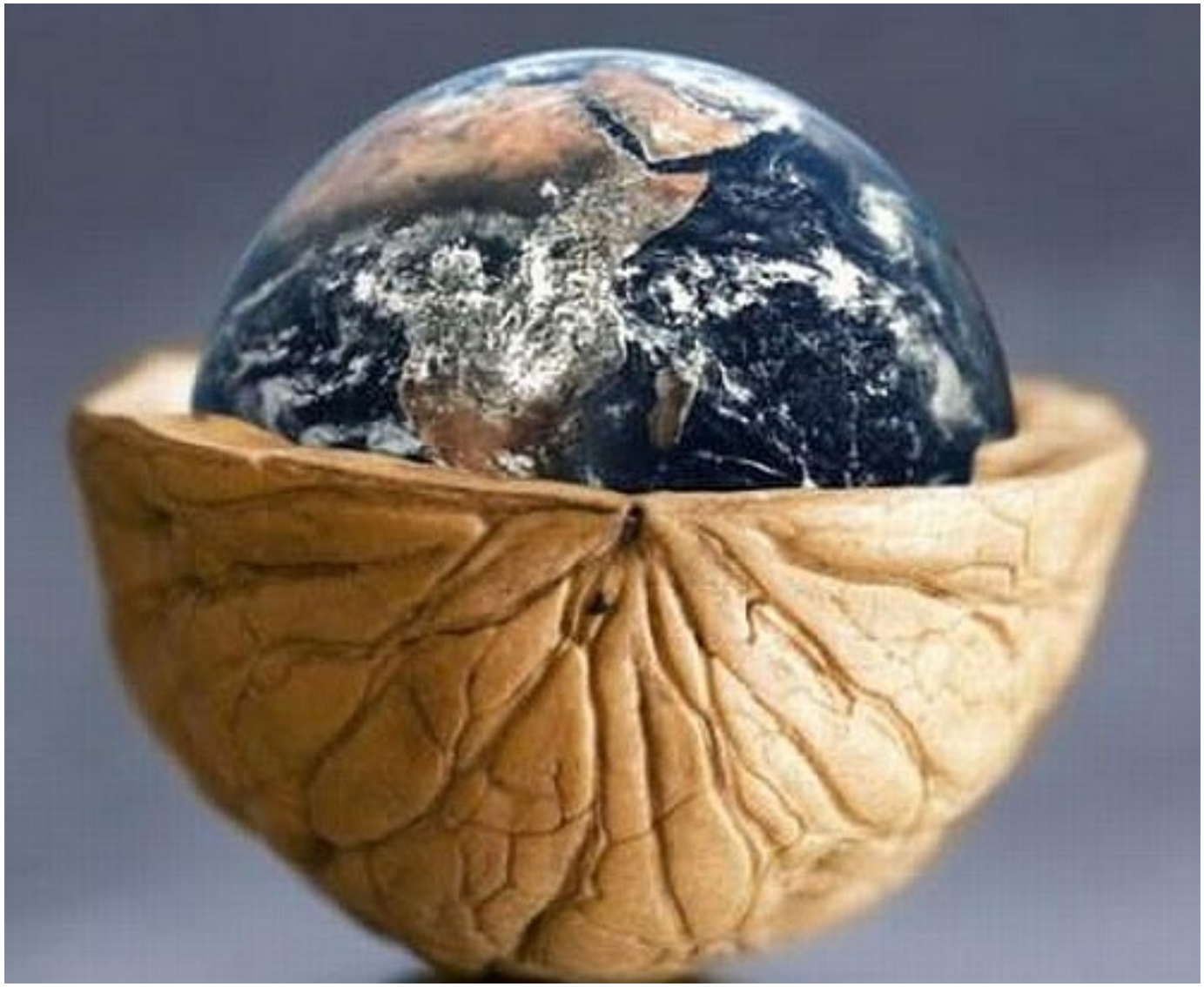


Survey Shows…

1. Different responses
2. No international engagement?
3. Low cross-campus experience or knowledge of RPS/Visual Compliance
4. Application of Export Control regulations to:
   - Payments to foreign entities
   - Hiring/Sponsoring
   - Travel & Research
   - Collaboration
   - Shipping

Survey Conclusions

EXPORT CONTROLS



LET'S BREAK
IT DOWN IN
PLAIN
ENGLISH

Federal Agencies

Regulations	Federal Agency with Oversight	Area of Oversight
ITAR *International Traffic in Arms Regulations*	Department of State, Directorate of Defense Trade Controls (DDTC)	Technologies with **inherently military** properties
EAR *Export Administration Regulations*	Department of Commerce, Bureau of Industry and Security (BIS)	Technologies with both commercial and military applications, most commercial items, and certain military items not controlled under the ITAR
OFAC *Office of Foreign Assets Control*	Department of the Treasury, OFAC	Prohibits transactions of value with **certain countries** and individuals

What is Controlled/Regulated?

- Distribution of:

Technology
Technical Data

Hardware

Equipment

Materials

Software

- Technical Assistance to foreign nationals

“Foreign Person”

Non-U.S. Person:

- No US Citizenship/Permanent Resident Status
- Foreign Organization
- Employer

You said “access”… What IS an Export?!?

An “Export” is Like Access

The transfer of export-controlled information, technical data, technology, commodities or software to a non-U.S. person.

What Else is Regulated?

Payments & Services with denied entities or sanctioned countries

OFAC

Office of Foreign Assets Control

Restricted Party Screening (RPS)

Identifies restrictions of working with certain individuals/entities.

This Means Attention to…

- ✓ Sensitive/high value items and research
- ✓ Individuals developing or using regulated "THEMS"
- ✓ Information accessed or transported abroad
- ✓ Providing & accepting payments

Research

- ✓ Development/Creation/Renovation
- ✓ EAR/ITAR Technology, Hardware, Equipment, Materials, Software
- ✓ Foreign Persons or Entities
- ✓ Sanctioned Countries
- ✓ Contractual Restrictions

Travel

Publications

Procurement

Shipping

Agreements/ Collaborations

Hiring

Research: WHAT NOW?!?

? Item sensitive/high value?

? Data involved?

? Off-the-Shelf?

? Where are Foreign Persons or Entities?

? Anything different about an agreement or restrictions?

Foreign Nationals: Visiting, Hiring, or Sponsoring

1. Complete I-129 Form for H-1B or O Visas
2. Determine access to research
3. Conduct Restricted Party Screening- Visual Compliance

Purchases & International Shipments

- Request Export Control Classification Number (ECCN) when purchasing equipment/software.
- Purchase Orders & P Card
- End-user certificates
- Restricted Party Screening

Vendors

1. Confirm no U.S. trade restrictions.
2. Confirm individuals and businesses are eligible to receive payments from U.S. banks.

How do you do this??

Restricted Party Screening
BEFORE
arranging for services or purchasing items.

International Travel: When to Contact UECP

- ✓ Embargoed Locations
- ✓ Monetary Transactions
- ✓ Transporting Items
- ✓ Accessing export controlled information

Information Technology

Restricted access to export-controlled data

Travel with clean laptop

Time for
review

Which campus activities have EC implications?

Who should be screened?

- Sponsors
- Vendors
- Non-UA project personnel
- Parties involved in international collaborations and shipments
- New hires
- DCCs
- International Visitors

When should you contact UECP?

Thank you!

It REALLY DOES take a village…

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