



TO: Deans & Directors
FROM: Elizabeth R. Cantwell, Senior Vice President for Research and Innovation *Ely R Cantwell*
CC: Sangita Pawar, Vice President of Operations and Kay Ellis, Director of Export Control
RE: Reminder on Restricted Party Screenings – International Collaborations
DATE: April 9, 2021

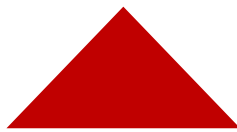
As you all know, we are seeing an uptick in Federal interest in international engagements on the part of universities, and we have every reason to expect this interest will only increase. We also know that international collaborations are a key component to the success of our research and education at the University of Arizona. This memo is meant as a reminder that these valued and encouraged partnerships require attention to balancing global innovation and compliance with federal regulations so that our people and our partners are protected. Observed failures at sister institutions have shown that real diligence in conducting our required Restricted Party Screenings before international travel, collaboration, shipping, or other involvement prevents individuals, departments, the University, and international partners from inadvertently violating federal laws and regulations. This protects our people from unwanted attention, investigation, and other outcomes that at best make them feel targeted, and at worst result in adverse actions.

Individuals, universities, and businesses deemed [Parties of Concern](#) face federal restrictions for a number of reasons, including:

- Due to export violations
- Diversion of technology and services to a foreign military
- Participation in terrorist activities or programs of weapons of mass destruction
- Threats to U.S. economic vitality, or to national security.

We remind our community that *any anticipated or actual involvement* with these Parties must be reviewed by RII'S [Export Control](#) for potential risks. Certain parties are prohibited, others may require federal approval (i.e., a license).

Restricted Party Screenings must be conducted prior to engaging with an international partner, whether to collaborate on research or educational programming, enter agreements, or conduct other business. Since 2008 the University has used [Visual Compliance](#) to identify Parties of Concern. This system provides instant notifications of potential matches to Parties of Concern. Export Control evaluates these screening results and provides guidance on risks and appropriate action. The chart below highlights international engagement requiring screenings in advance of your travel, research, or other University business. A more comprehensive list with responsible screening parties is available [online](#).



International Engagement or Activity	Screen
Visiting Scholars	Individual & institutions of study/employment
Formal Agreements, Contracts, IMOUs	Institutions, companies, individuals
Informal international research collaborations or partnerships	Individuals, institutions, organizations
Educational programming	Institutions
Event partnership/sponsorship	Foreign institutions or organizations
Sending/sharing items, materials, or technology abroad	Institutions, companies, individuals
Travel to countries subject to extensive U.S. sanctions and embargoes	<i>Export Control will assist in determining.</i>

Export Control (export@arizona.edu) will assist in identifying a screener for your unit and will address other questions about this process. [Policy](#) and additional information is available online: <https://rgw.arizona.edu/compliance/export-control-program>.

Thank you for your continued due diligence to protect our international engagement and research, and most importantly our colleagues and partners.