Export Control Basics

Important Terms
→ Export
→ Foreign Persons
→ Technical Data
→ Defense Service

U.S. Governing Authorities
→ Department of State (ITAR)
→ Department of Commerce (EAR)
→ Department of the Treasury (OFAC)

Exclusions & Exemptions
→ Fundamental Research
→ Educational Information
→ Public Domain

Export Controlled Items & Technology
→ Dual-Use Commercial Items
→ Space Applications
→ Military Applications and Services

Want to know more about export controls?
CITI training courses focused on export controls are available within the "my training" module of *https://my.ufl.edu*

Regulations and Commodities

Office of Foreign Assets Control (OFAC); U.S. Department of the Treasury
Sanctions programs which can affect travel abroad, transactions with individuals and entities, and the export or import of items.

Export Administration Regulations (EAR); U.S. Department of Commerce
Regulates commodities and information which are commercial in nature but also may have a military end-use, "dual-use" items.

International Traffic In Arms Regulations (ITAR); U.S. Department of State
Regulates defense articles, technical data and defense services which are specially designed or modified for military use.

Controlled Research and Information Technology
Controlled technical data and information requires secure computing resources to mitigate risk to the faculty and the university. The university recommends the use of ResVault to meet these requirements in an affordable user-friendly environment. For additional information on ResVault, visit: *www.rc.ufl.edu/services*

UF Research Integrity develops and implements research compliance programs and coordinates activities with various compliance offices and committees. UF Research Integrity is responsible for the following areas: Export Control, Global Activities, and Research Integrity.

UF Research Integrity – University of Florida

PO Box 115500
Gainesville, FL 32611-5500

Web: https://research.ufl.edu/compliance.html
Email: exportcontrol@research.ufl.edu
Phone: 352-392-9174

UF
Research
UNIVERSITY of FLORIDA

UF RESEARCH
INTEGRITY
Export Controls

About Export Controls

Export Controls are regulations and laws governing the transfer of sensitive items and technology used in research and other university activities.

Export Control issues can arise on many fronts unrelated to research, including collaborations, travel or partnerships. It is important for the university community to have an awareness of the regulations and how they may affect UF faculty, staff and students.

Compliance Overview

A few quick ways to ensure compliance with Export Controls:

→ When shipping or transferring physical items abroad, contact UF Research Integrity.
→ Complete the Export Compliance questionnaire in UFIRST with all known details.
→ Before finalizing plans for international travel or activities with Cuba, reach out to UF Research Integrity.
→ When traveling abroad, only take research data that is publically available and necessary for your travel.

Export Control Reviews

The export control questions within UFIRST assist with identifying areas where UF Research Integrity staff can assist with addressing potential risks appropriately. Sponsored Programs utilizes the questionnaire for appropriate routing to facilitate timely reviews.

International Travel

University of Florida employees who travel abroad to teach, present at conferences, or conduct research should be aware of potential export control requirements for items or equipment they carry with them. Hand-carrying items out of the U.S. (even temporarily) is considered an export and needs to be reviewed and appropriately authorized.

● *BEFORE traveling abroad, there are three things to consider:*

● *1. Where are you going?*
To ensure receipt of appropriate guidance, please register all international travel at: *https://internationalcenter.ufl.edu.* With the exception of embargoed countries, traveling abroad does not require federal export control approvals.

● *2. What are you taking with you?*
Rule of Thumb: If you don't need it, don't take it.
Most low-tech commercial devices such as laptops and iPads do not need an export license, however, the length of time abroad, destination, and cost of the items transported may affect the outcome. Be sure to register the transfer or temporary export of all UF-owned items through *https://myassets.fa.ufl.edu/*

● *3. What is the purpose of your travel?*
General travel to present at conferences or conduct research in the field can trigger export control concerns based on the nature of the work and destination of travel. It is best to have the destination and research partners screened to ensure no work with Restricted Parties will be conducted.

What Do Universities Export?

Controlled technical data and information are the most common items university researchers export. Under the current regulations, the transfer of controlled technical data, software or items is considered an export even when transferred to a foreign person within the U.S. (deemed export). Because UF is a diverse and open landscape that encourages international collaborations, there are many avenues for exports to occur.

Much of the work conducted on campus falls into the category of "fundamental research" which can be shared broadly with the academic community. However, the international shipment of physical items, including samples and prototypes, remain subject to specific requirements. Secure research with dissemination restrictions may also be controlled and require additional management.

Activities which may indicate additional controls include:

→ International travel to sensitive countries especially when bringing any UF-owned item or data.
→ Transfer/disclosure of controlled information to a foreign person.
→ International Research Collaborations.
→ Participation by a foreign person on a controlled research project.
→ International shipments or temporary export of equipment, items, or software.