

SUBJECT Export Control Policy	Effective Date 10/9/2014	Policy Number 4-209	
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	Responsible Authority Director of Research Compliance and Assistant Director of Export Controls		

APPLICABILITY/ACCOUNTABILITY

This policy applies to all members of the university community.

BACKGROUND

The University of Central Florida (UCF) encourages and supports open research and the free exchange ideas, but also recognizes that the United States (U.S.) has enacted export control laws that control the release of certain technologies and information outside of the U.S. and to foreign nationals within the U.S. (deemed export). Export control laws exist to protect our country, its citizens, and the innovative superiority of the United States for reasons of national security, foreign policy, competitive trade, and the prevention of the spread of weapons of mass destruction.

Although most university activities and research are exempt from export control laws, UCF engages in activities, research, and the development of new technologies that are subject to export restrictions. The application of export control laws requires a detailed analysis of covered university activities and research to determine if the export is prohibited, or requires a license or other government approval. This policy establishes the program and procedures necessary to ensure the university and its employees remain in full compliance.

Among other regulations, the Department of Commerce regulates exports of commercial items with potential military applications (dual-use items) through the Export Administration Regulations (EAR), the Department of State regulates exports of items and services specifically designed for military applications through the International Traffic in Arms Regulations (ITAR), and the U.S. Department of Treasury administers economic sanctions against certain countries, entities, and individuals through the Office of Foreign Assets Control (OFAC) sanction and embargo regulations. These laws control the distribution by whatever means, of strategically

important hardware, software, and technology to foreign nationals, whether in the U.S. or abroad. Items regulated and restricted by ITAR are included on the U.S. Munitions List (USML) and items controlled and restricted by the EAR are included on the Commerce Control List (CCL).

POLICY STATEMENT

The University of Central Florida is committed to compliance with federal export control laws, regulations, and sanctions. The Office of Research & Commercialization (ORC) is the designated authority charged with compliance oversight of U.S. export control requirements for sponsored program activities and has final authority on such matters. Individuals acting on behalf of the university are responsible for the proper handling, transfer, access, storage, control and dissemination of export controlled hardware, software, information, technology, and technical data to destinations and persons outside of the U.S., as well as in some cases, to foreign nationals at the university engaged in instruction, conducting research, or providing service activities.

The Office of Research Compliance, a unit within the ORC, is the functional administrative unit charged with the responsibility for oversight of compliance and recordkeeping of all applicable exports and regulated transactions with sanctioned individuals, entities, and countries. UCF personnel are responsible to adhere to the protocols, policies, and procedures issued by the Office of Research Compliance when export or trade sanction regulations apply and must properly handle export controlled hardware, software, information, technology, or technical data by regulating access, use, storage, and disposal.

The civil and criminal penalties associated with violating export control regulations can be severe, ranging from administrative sanctions including loss of research funding to monetary penalties to imprisonment for individuals. Anyone found to have engaged in conduct contrary to this policy is subject to disciplinary action by the university up to and including dismissal or expulsion and civil or criminal prosecution.

EXPORT CONTROLS COMPLIANCE PROGRAM

Export compliance protocols, policies and procedures and key cooperating offices are available in the online UCF Export Control Management Plan (ECMP) http://www.research.ucf.edu/documents/PDF/UCF%20ECMP%203_25_2014_Rev%202.pdf. UCF personnel must comply with the requirements and procedures communicated in the ECMP. The Office of Research Compliance in concert with other departments and units as necessary will administer the compliance program for:

1. Identification and management of export controlled sponsored program activities
2. Sponsored program activities involving disclosures or transfers to foreign persons of export controlled technologies in the United States (deemed exports)
3. Non-immigrant worker visa applications (H-1B, H-1B1, L-1, O-1 J-1) involving export controlled technologies (deemed export visa applicant screening)

4. Sponsored program activities involving international exports (shipping)
5. International travel
6. Compliance screening for denied party/entity list and other government debarred list transactions
7. Sponsored program activities involving the use of export controlled equipment
8. Restrictive trade practices, foreign corrupt practices, financial transactions, and anti-boycott compliance

The Office of Research Compliance will assist academic, research, and business units and direct support organizations to comply with export and trade sanction regulations on non-sponsored activities on a case-by-case basis.

The university is committed to educating its employees, professors, students, researchers, or other collaborators on U.S. export control laws and regulations and their particular application within a university research setting. As part of the university's ongoing commitment to export control compliance and education, the university has established a website at: <http://www.research.ucf.edu/ExportControl/> that contains the ECMP, forms, training modules, and reference materials.

FUNDAMENTAL RESEARCH EXCLUSION

Export control regulations may conflict with the university's tradition of academic freedom and openness in research and provide a broad exclusion from export controls for certain academic research that meets several legal criteria, commonly referred to as the "Fundamental Research Exclusion."

The qualifying criteria for research results to be exempt from U.S. export controls are established by the U.S. Government and include basic and applied research as follows:

1. conducted free of any participation restrictions,
2. conducted free of any publication restrictions, or
3. conducted free of any access or dissemination controls required for proprietary or national security reasons.

It is critical that all research activity is assessed to determine if any hardware, software, information, technology, or technical data involved or generated would void the fundamental research exclusion.

EXPORT LICENSE OR OTHER APPROVAL REQUIREMENT

While most research results qualify as "fundamental research" and are not subject to export controls, there are certain conditions under which the performance of the actual research or export of critical technologies, including certain technical and scientific data, software or

tangible items, is either prohibited by law or requires an export license or other government approval before an export may take place.

Examples include, but are not limited to:

1. Shipment or transmission of tangible equipment, items, software, materials, and technical data listed on the Commerce Control List (CCL) or U.S. Munitions List (USML) outside of the United States by any means (e.g., shipping, hand-carrying, emailing), whether temporarily or permanently.
2. Providing controlled technologies or technical data related to a USML defense article in any manner to foreign national employees, professors, students, researchers, or other foreign national collaborators whether in the U.S. or abroad without a license or other approval.
3. Importing or using a defense article.
4. Conducting international collaborations or exchanges (e.g., financial transactions and providing goods and services of value) with embargoed or sanctioned entities, governments, and countries.

MONITORING AND COMPLIANCE

UCF is registered with the federal government as a defense manufacturer and has designated ORC to monitor export compliance in sponsored program activities that are not otherwise exempt. The vice president of research and commercialization, director of research compliance, and assistant director of export controls are empowered officials. Possible violations of governmental laws and regulations will be investigated by a university empowered official or designee. Action will be taken according to the nature, severity, and scope of the offense. The university empowered official(s) have the authority to suspend or terminate a research, teaching, testing, or other export activity if the empowered official determines the activity is not in compliance, or will lead to noncompliance with existing export or sanction laws or policy.

DEFINITIONS

Empowered official. Authorized full-time permanent employees registered with the Department of State in accordance with federal regulation 22 CFR 120.25, who have independent authority to inquire into any aspect of a proposed export or temporary import, to verify legality and compliance with U.S. export control laws and sanctions, and to refuse to authorize or limit the transaction without prejudice or other adverse recourse.

Export control laws, regulations, and sanctions. Specifically, the Arms Export Control Act (AECA), as amended, and enumerated in the International Traffic in Arms Regulations (ITAR) 22 CFR Parts 123 – 130, and the Export Administration Act (EAA) of 1979 enumerated in the Export Administration Regulations (EAR) 15 CFR Parts 730 through 774, and the Atomic Energy Act of 1954 (AEA) (Public Law 83-703), and both the Nuclear Regulatory Commission (NRC) 10 CFR Part 110 and the Department of Energy Regulations, 10 CFR Part 810

(“DEAR”), and U.S. Department of Treasury, Office of Foreign Assets Control (OFAC) sanction and embargo regulations, and other applicable federal agency export control regulations.

Foreign national. Any person who is not a U.S. citizen or U.S. lawful permanent resident.

Fundamental research. For purposes of this policy, fundamental research means, as defined by the EAR, ITAR, and NSDD 189, basic or applied research in science and engineering performed or conducted on campus at an accredited institution of higher learning in the U.S. where the resulting information is ordinarily published and shared broadly in the scientific community. Fundamental research is distinguished from research that results in information restricted for proprietary reasons, national security reasons, or pursuant to specific U.S. government access and dissemination controls. Information or technology that results from fundamental research is not subject to export controls.

Hardware. Any article (ITAR term), item (EAR term), material, commodity, or supply except technology or software.

Permanent resident. Individuals who have permission to reside in the U.S. on a permanent basis (i.e., holders of “green cards”).

Proprietary. Any form and type of financial, business, scientific, technical, economic or engineering information, including patterns, plans, compilations, program devices, formulas, designs, prototypes, methods, techniques, processes, procedures, programs, or codes, whether tangible or intangible, and whether or how stored, compiled, or memorialized physically, electronically, graphically, photographically, or in writing if:

- The owner thereof has taken reasonable measures to keep such information secret, and;
- The information derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable through proper means by the public.

Proprietary information may take such forms as trade secrets, privileged or confidential commercial or financial information, or any other information not otherwise required to be disclosed.

Software. A collection of one or more programs or microprograms fixed in any tangible medium of expression such as source code (programming statements) or object code (machine-readable instructions).

Sponsored research. All organized research and development activities sponsored by federal and non-federal agencies and organizations, including university sponsored research that are accounted for and separately budgeted.

Technology. Specific information necessary for the development, production, or use of hardware or software, such as models, engineering designs, blueprints, drawings, technical assistance, or other types of information whether tangible or intangible.

Un-sponsored research. The performance of work that is not funded by a sponsor and that is not separately budgeted or accounted for.

PROCEDURES

All sponsored research activities and un-sponsored research activities that interface with sponsored programs must be evaluated prior to commencement to determine if export controls are applicable, as detailed within the following protocols. Sufficient time must be allowed for the empowered official to review such activities and issue guidance. Key faculty, staff, and administrative personnel will assist the empowered official in determining applicable export control measures to regulate the export of hardware, software, technology by any means, including deemed-exports. Such measures include implementing necessary security measures (e.g., restricting access, acquiring licenses or other government approval, implementing a technology control plan).

Identification and Management of Export Controlled Sponsored Program Activities.

Principal Investigators (PI) engaged in research of any scope and duration shall, prior to commencement, be responsible to review whether the intended research is subject to controls or requirements contained within export regulations and, if applicable, to comply with such requirements. This includes continually reviewing the research project while being performed for changes that would subject the project to export controls.

The Sponsored Programs Office will ensure that contracts, grants, and agreements are executed in compliance with applicable export control regulations, laws, sanctions, and embargoes by assisting the principal investigator in identifying any export control, foreign national, or publication restrictions in solicitations and awards. When possible, the Sponsored Programs Office will negotiate any access, publication, dissemination, or participation restrictions to allow the sponsored project to qualify as fundamental research, in accordance with the protocols outlined in the ECMP http://www.research.ucf.edu/documents/PDF/UCF%20ECMP%203_25_2014_Rev%20_2.pdf

1. Determine whether the intended or current research qualifies as fundamental research as that term is applied in the export control regulations ITAR (22 CFR § 120.11) and EAR (15 CFR § 734.8). If the intended or current research qualifies as fundamental research, then no export license or restriction is required.
2. If, after review, it is determined that the scope of the intended or current research falls within the export control regulations contained in either the EAR, the ITAR, or potentially involve any sanction or embargo activities, or controlled technologies, the sponsored program will be forwarded to the ORC Office of Research Compliance for comprehensive compliance assessment review by an authorized staff member.
 - a. The authorization for foreign nationals to engage in, access, use or possess export controlled hardware, software, or technology on sponsored program activities is dependent on the conditions identified in applicable U.S. laws, regulations, sanctions or government licenses, or approvals. It is the responsibility of the Office of Research Compliance to determine export compliance requirements.

- b. If the intended or current research does not qualify as fundamental research, the ORC Office of Research Compliance will determine whether the intended or current research is within the control of the Department of State under authority of ITAR (military applications only) or is within the control of the Department of Commerce under the authority of the EAR (dual usage – both military and commercial applications, or proliferation applications). In considering this issue, the ORC Office of Research Compliance will:
 - i. Consult the USML (22 CFR § 121.1) and/or the CCL (15 CFR § 774, Supp. 1) to determine whether the intended or current research involves any items or technologies that are regulated.
 - ii. Examine the procedures contained in the ITAR and/or the EAR (15 CFR § 732) to determine whether a license will be required to export, release, transmit, or allow access to the results from the intended research, or is required to export, release transmit, or allow access to the current research.
 - iii. Examine U.S. sanction and embargo programs administered by the U.S. Department of the Treasury.
 - iv. Issue a request for commodity jurisdiction or commodity classification with the appropriate federal agency, if necessary.
 - v. Obtain export licenses, if necessary, and implement a project-specific Technology Control Plan and other documents required by applicable export control regulations including, restricting access and participation to foreign nationals.
 - c. The principal investigator and unit are responsible for implementing and complying with a project-specific Technology Control Plan issued by the Office of Research Compliance and other security measures necessary for compliance.
3. If, after review, it is determined that the scope of the intended research does not fall within the export control regulations the principal investigator and researchers may commence with the research initiative unless otherwise restricted by other policies or procedures of the university.

Sponsored Program Activities involving Disclosures or Transfers to Foreign Persons of Export Controlled Technologies in the U.S. (Deemed Exports).

The release or transmission of technology or technical data, including training, subject to export controls to a foreign national (including graduate students, postdocs, visiting scholars, collaborators, faculty, etc.) within the U.S. is a “deemed export” and is considered an export to that person’s home country. A license may be required before the information can be released or transferred.

Examples of “releases” to foreign nationals include:

1. allowing a foreign person to participate in a research project,
2. instructing the foreign person in research techniques and methods,
3. providing access to equipment during a facility tour,

4. providing access to technical equipment, research samples, or experiments by visual inspection or use, and
5. verbal exchanges of controlled information.

It is the responsibility of the empowered official to determine the licensing requirements involving deemed exports. If a license is required, the empowered official will coordinate the license application process and submit the application to the appropriate federal agency. Obtaining a license can take two to six months (or more) and the U.S. government can deny a request thereby terminating the deemed export. No export can take place until the requisite license is obtained. Deemed export reviews conducted by an empowered official involving a sponsored program activity will, at a minimum, require the principal investigator to submit the following information:

1. Description of the information to be released – this includes a detailed description of the information, item, software, or technology, technical specifications, origin of the item and any contractual non-disclosure or use restrictions that may exist.
2. A list of the home country and citizenship of all persons that will be given access to the information, item, software, or technology, including all information required in a license application.
3. Supplemental explanation describing the source of the information or item, software, or technology and if it is a result of fundamental research.
4. Response to whether the information item is published, patented, or in some other manner in the public domain.

Non-immigrant Worker Visa Applications (H-1B, H-1B1, L-1, O-1, J-1) Involving Export Controlled Technologies (Deemed Export Visa Applicant Screening)

Faculty and staff sponsoring non-immigrant workers are responsible for complying with U.S. export and sanctions regulations in all university activities involving international collaborations or foreign exchanges, including hiring foreign persons on a permanent or temporary basis (international visitors, scholars) or allowing a volunteer to participate on a sponsored program activity. Training, educational activities, and technical assistance incidental to a controlled technology used in a sponsored program requires review by the ORC Office of Research Compliance to conduct a deemed export assessment for H-1B, H-1B1, L-1, O-1 and J-1 visas.

Faculty and staff sponsoring a non-immigrant worker are required to furnish the ORC Office of Research Compliance with all necessary information to perform an attestation on the *Questionnaire for Sponsoring a Foreign Scholar, Scientist, Visitor or Guest*. Faculty, staff, units, and departments are responsible for complying with all regulatory guidelines issued by ORC regarding deemed exports in addition to all provisions issued by the U.S. government in licenses or other approvals.

Sponsored Program Activities Involving International Exports (Shipping)

It is the responsibility of the exporter, prior to shipping any item, article, technology, or technical data out of the U.S. related to a sponsored program activity, to determine if the export has any license requirements. To make this determination, the exporter needs to contact the ORC Office of Research Compliance who will investigate regulatory requirements and provide proper guidance. Determining license requirements of an item can be a complex and complicated

process requiring proper commodity jurisdiction and classification of an item. The final determination of whether an item requires a license, qualifies for a license exemption or exception, or can be exported as “No License Required” (NLR) will be made by the empowered official.

All tangible items, software code, and information not on a U.S. export control list may be shipped or transmitted to any country, individual or entity that is not sanctioned, embargoed, or otherwise restricted for export. If a license is required for export, the empowered official will coordinate the license application process and submit the application to the appropriate federal agency. Obtaining a license can take two to six months (or more) and the U.S. government can deny a request, thereby terminating the export. No export (or deemed export) can take place until the requisite license is obtained. Exports involving a sponsored program activity will, at a minimum, require the exporter to submit the following information to the empowered official:

1. A list of the items, article, or technical data intended for export (including deemed export). This includes a detailed description of the item, software, technology, or technical specifications, origin of the item or data, and any contractual non-disclosure or use restrictions implicated in the transaction.
2. The intended destination of the item, software, technology, or data.
3. The recipient and end-user.
4. The intended end-use.
5. Response to whether the time or data is published, intended to be published, patented, or in some other manner in the public domain.

International Travel

Travel outside the United States can require a federally-issued license, depending on the proposed destination, equipment, item(s) or data being exported (if any), the purpose of the travel, and persons, entities, or countries involved in the travel.

1. All international travel related to a sponsored program will be reviewed by the Sponsored Programs Office and may require the traveler complete an ***International Travel Compliance Review Form***. Certain sponsored programs may be subject to federal law that requires government approval or licensing before exporting equipment, research data, or performing research abroad. This can include the hand carrying of items that have both commercial and military, or proliferation applications, proprietary information, or items that are considered defense articles, even if used in an academic or research environment. Such items may include data, software or technology, blueprints, design plans, field data, equipment, and retail software packages and technical information.

The questionnaire will be forwarded to the ORC Office of Research Compliance for review. The ORC Office of Research Compliance will determine if any of the equipment, items, samples, or technical data or services (including training) proposed for export in furtherance of a sponsored program activity require licensing or other approval and if any of the parties involved in the transaction are listed on various federal restriction lists or subject to a U.S. sanction or embargo.

U.S. Departments of State, Commerce and Treasury Compliance Screening for Denied Party/Entity List and other Government Debarred List Transactions

Faculty and staff are required, prior to engaging in a foreign collaboration, to review the various federal lists that restrict certain transactions, including:

1. certain practices,
2. instruction,
3. research performance or collaborations,
4. providing service activities, and
5. financial transactions.

The ORC Office of Research Compliance will coordinate and facilitate the screening of potential parties to such regulated transactions in accordance with federal regulation among various departments and units. The federal screening lists are available at the following federal website http://export.gov/ecr/eg_main_023148.asp , and include, but are not limited to:

1. Department of Commerce – Bureau of Industry and Security: Denied Persons, Unverified and Entity Lists.
2. Department of State – Bureau of International Security and Non-proliferation: Nonproliferation Sanctions
3. Department of State – Directorate of Defense Trade Controls: Arms Export Control Act Debarred List
4. Department of the Treasury – Office of Foreign Assets Control: Specially Designated Nationals List and countries and practices of which the U.S. government has imposed a sanction or embargo.

Upon positive identification of a party that appears to match a list, the screening party is obligated to contact the ORC Office of Research Compliance, which will issue regulatory guidance to comply with U.S. export control regulations, laws, and sanctions. There may be a strict export prohibition, requirement for seeking a license, evaluation of the end-use or user to ensure it does not result in an activity prohibited by any U.S. export regulation sanction or embargo. Faculty, staff, units, and departments are responsible for complying with all regulatory guidelines issued by ORC regarding Denied Party/Entity List and other government Debarred List transactions in addition to all provisions issued by the U.S. government in licenses or other approvals.

Sponsored Program Activities Involving the Use of Export Controlled Equipment

The ORC Office of Research Compliance will identify export controlled equipment in accordance with the following:

1. EAR Commerce Control List (CCL) equipment, technical data and “use”:
 - a. The release or transmission of technology or technical data subject to the EAR created or developed at UCF to a foreign national within the U.S., including training (including graduate students, postdocs, visiting scholars, collaborators, faculty, etc.) is allowable on sponsored program activities qualifying as

fundamental research or in furtherance of an official published catalog course taught within the U.S. Technology or technical data subject to the EAR not qualifying as fundamental research or instructed outside of the U.S. is subject to export controls.

- b. The operation of equipment subject to the EAR by a foreign national on campus, including instruction of the manner of operation of the equipment, is allowable on sponsored program activities so long as the instruction does not involve each of the following six criteria pursuant to 15 CFR 772.1: Operation, installation (including on-site installation), maintenance (checking) repair, overhaul, and refurbishing. Instruction of all six criteria requires a license unless an exception or exclusion apply.
2. ITAR United States Munitions List (USML) defense articles, technical data and defense services:
 - a. All defense articles including technical data and defense services (instruction, training, or know-how) related to defense articles, even if not for military use, and information required for the design, development, production, manufacture, assembly, operation, repair, testing, maintenance, or modification of defense articles are subject to export controls and cannot be released to or operated by a foreign national without a license, or other government approval. Such articles and data require a Technology Control Plan or a Custody Access and Use Agreement.
 3. Third party export controlled items or data:
 - a. CCL items, USML defense articles, technology, technical data, and associated defense services provided by a third party to the university and any of its departments, divisions, colleges, units, and organizations or faculty, staff, and students may not be released to or openly shared with certain foreign nationals even though those individuals may be important contributors to the performance of a sponsored program activity utilizing the export controlled third-party item or data. Proprietary or restricted information that is required for the development, production, or use of an item subject to the EAR or the ITAR is itself export controlled. It is the responsibility of the recipient of the third-party export controlled items or data to notify the ORC Office of Research Compliance of the acceptance of such items and information by completing a *Custody, Access and Use Agreement*. If the researcher or principal investigator needs to transfer the items or information to foreign nationals, the exporting party is responsible to contact the empowered official for an export determination before such a transfer occurs. The empowered official will obtain a license or qualify the transaction under an exemption, exception, or exclusion, and document the transaction.

Restrictive Trade Practices, Financial Transactions and Anti-Boycott Compliance

The United States imposes restrictions under various legal authorities against engaging in certain restricted trade practices and transactions that impose a boycott of Israel. Those laws discourage,

and in some circumstances, prohibit U.S. companies and universities from furthering or supporting the boycott of Israel sponsored by the Arab League, and certain Moslem countries, including complying with certain requests for information designed to verify compliance with the boycott. Anti-boycott provisions are issued in 15 CFR §760.

U.S. sanctions administered by the Office of Foreign Assets Controls (OFAC) regulations prohibit the university from providing material financial assistance or anything of value, including services, to any blocked or sanctioned country, individual, entity or organization, including a government agency of a sanctioned country. This can involve subcontracts, international vendors, or fellowship payments to a researcher in a foreign country. For example, a professional presentation, whether or not it contains materials controlled under ITAR or EAR, is deemed under OFAC to be a “service” and “something of value” provided to the recipient audience. Before agreeing to provide funding to a foreign national, personnel should contact the empowered official for assistance in identifying potential transaction restrictions.

RELATED INFORMATION

U.S. Department of State, Directorate of Defense Trade Controls <http://www.pmdtdc.state.gov/>

U.S. Department of Commerce, Bureau of Industry and Security <http://www.bis.doc.gov/>

U.S. Department of Treasury, Office of Foreign Assets Control
<http://www.treas.gov/offices/enforcement/ofac/>

UCF, Office of Research & Commercialization, Export Compliance
<http://www.research.ucf.edu/ExportControl/>

UCF Export Compliance, Frequently Asked Questions
<http://www.research.ucf.edu/ExportControl/faq.html>

UCF, International Services Center <http://www.intl.ucf.edu/>

UCF, Office of Internationalization <http://www.international.ucf.edu/>

RELATED DOCUMENTS

UCF Export Compliance Guidelines
<http://www.research.ucf.edu/ExportControl/policies.html>

UCF Export Controls Management Program
http://www.research.ucf.edu/documents/PDF/UCF%20ECMP%203_25_2014_Rev%202.pdf

International Traffic in Arms Regulations (ITAR), 22 CFR §§120-130
http://www.pmdtdc.state.gov/regulations_laws/documents/official_itar/ITAR_Part_121.pdf

ITAR, U.S. Munitions List (USML), 22 CFR § 121.1

<http://www.ecfr.gov/cgi-bin/text-idx?SID=86008bdffd1fb2e79cc5df41a180750a&node=22:1.0.1.13.58&rgn=div5>

Export Administration Regulations (EAR), 15 CFR §§734-774

http://www.access.gpo.gov/bis/ear/ear_data.html

EAR, Commerce Control List (CCL), 15 CFR § 774, Supplement No. 1

http://www.ecfr.gov/cgi-bin/text-idx?SID=9e6812e666569c99554abd395da45965&node=ap15.2.774_12.1&rgn=div9

Office of Foreign Assets Control (OFAC) Regulations, 31 CFR §§500-599

http://fedbbs.access.gpo.gov/library/fac_bro/facei.pdf

National Security Decision Directive 189

<http://www.fas.org/irp/offdocs/nsdd/nsdd-189.htm>

Office of Internationalization, International Academic Agreements (2-900)

Office of Internationalization, Travel to Restricted Destinations (2-903)

International Services Center, UCF Policy for All Foreign Nationals (2-901)

FORMS

Questionnaire for Sponsoring a Foreign Scholar, Scientist, Visitor or Guest

<http://www.research.ucf.edu/documents/PDF/DeemedExportQuestionnaire.pdf>

International Travel Compliance Review Form

http://www.research.ucf.edu/documents/PDF/ORC_Travel_Compliance_Review.pdf

Tool of Trade Checklist

<http://www.research.ucf.edu/ExportControl/checklist.html>

Tool of Trade Certificate

<http://www.research.ucf.edu/documents/Word/TMP%20-%20ENC%20Certification.docx>

CONTACT

For questions regarding ORC Export Compliance policies and procedures please contact the assistant director of export controls with the Office of Research & Commercialization, Office of Research Compliance, 12201 Research Parkway, Suite 501, Orlando, Florida 32826-3246, (407) 823-3778.

INITIATING AUTHORITY Vice President for Research & Commercialization

POLICY APPROVAL (For use by the Office of the President)	
Policy Number: <u>4-209</u>	
Initiating Authority: _____	Date: <u>10/8/14</u>
University Policies and Procedures Committee Chair: _____	Date: <u>10/7/2014</u>
President or Designee: _____	Date: <u>10/9/14</u>