

OFFICE OF RESEARCH & COMMERCIALIZATION

SUBJECT: Department and Unit Guidance on Denied Entities	Effective Date: November 2017	Guideline Number: ECO-7
	Supersedes: October 2013	Page Of 1 2
	Responsible Authority: Office of Export Controls	

APPLICABILITY

These protocols are applicable to all departments, units and members of the University of Central Florida (UCF) community.

PURPOSE

These protocols provide guidance to UCF departments and units regarding educational and/or research activities with “Parties” subject to U.S. Export Control Restrictions.

BACKGROUND

Multiple federal agencies, including the U.S. Department of Commerce, the U.S. Department of State, and the U.S. Department of Treasury, maintain lists of “Parties” subject to economic embargoes, trade sanctions, and additional export control restrictions (hereinafter referred to as the Consolidated Screening List (CSL)). Parties identified on the CSL include countries, corporations, organizations, universities, institutes, research labs, and persons. A party is added to the CSL if the party engages in illegal activity, or an activity contrary to U.S. national security or U.S. foreign policy interests. U.S. persons are generally prohibited from participating in activities with a party identified on the CSL without first obtaining a government issued license. Activities include, but are not limited to:

1. International travel to entity institutions or entity hosted conferences.
2. Meeting with persons on the entity list, whether in the US or abroad.
3. International recruitment or employment of faculty, staff, students or researchers affiliated with an entity
4. Hosting visiting Scholars, including furnishing a visa, or hosting someone in the US on a tourist visa.
5. Research or educational collaborations with a party on an entity list, in the U.S. or abroad.
6. Financial transactions, including receiving a donation, with a party on an entity list.
7. Commercial consulting or provisioning of services with a party on an entity list.
8. Providing assistance or know-how related to technologies subject to the Export Administration Regulations, the International Traffic in Arms Regulations, or other U.S. Export Control Regulations to a party on an entity list.

The CSL can be accessed online at: http://2016.export.gov/ecr/eg_main_023148.asp .

GUIDELINE STATEMENT

Pursuant to UCF Policy 4-209, *Export Control Policy*, UCF faculty, staff, students, and members of the UCF community must comply with all applicable U.S. Government Export Control Regulations, including the requirements outlined herein. UCF requires strict compliance with U.S. export control laws including conducting activities with “Parties” subject to economic embargoes, trade sanctions, and additional export control restrictions.

UCF has implemented a risk-based approach to determine when faculty, staff, and other members of the UCF community may engage in activities that involve parties subject to economic embargoes, trade sanctions, and additional export control restrictions. This approach is outlined below. The UCF Office of Research & Commercialization, through the Office of Export Controls, will assist departments and units with specific questions regarding educational and/or research activities with “Parties” subject to U.S. Export Control Restrictions.

PROCEDURES

A. Faculty, staff, students and other members of the UCF community with active clearances.

Due to federal security and reporting requirements, including the requirements outlined in the National Industrial Security Program Operating Manual (NISPOM), as amended, it is UCF’s policy that faculty, staff, students and other members of the UCF community with active clearances are prohibited from engaging in activities (see above) with persons with a current or prior affiliation with a party on the CSL in any manner. The term affiliation includes, prior or current student enrollment, employment, or other close affiliation with an entity enumerated on the CSL.

B. Faculty, staff, students and other members of the UCF community without an active clearance.

- i.** Faculty, staff, students and other members of the UCF community without an active clearance may engage in activities with individuals with a **prior** affiliation with a party found on the CSL, as long as the affiliation has not been active within the past 10 years.
- ii.** Faculty, staff, students and other members of the UCF community without an active clearance may not engage in activities with an individual with any active affiliation to a party on the CSL.