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Export Controls

Protecting U.S. economic advantage and national security. Providing training and guidance to facilitate compliance with Export control laws and regulations.

Ask yourself...

Does my activity give an economic advantage or advance their military or space program?

Am I protecting our information, research and technology?

Things to Consider...

- Export Classification of the project, data and any equipment/items received.
- Create a Technology Control Plan (TCP) work with the Export Controls Office (ECO).
- Secure the Room, limited access. Audit trail of when and who enters the room.
- Export controlled equipment, data, etc. needs to be secure with tracking and recordkeeping.

Know Your Customer & Your Visitors

Know who is on the phone, email, collaboration, visit – Conduct Restricted Party Screening (RPS), which is part of our export compliance program. Screen all visitors, institutions, and companies prior to visit, travel, or collaboration, etc.

Restricted Party Screening

Conducting a Restricted Party Screening (RPS) is an essential part of our Export Compliance program.

Contact the <u>Export Controls Office</u> to have a no-cost account set up for you or someone in your office.

International Travel

Where am I going, who am I visiting, and what am I doing there?

Am I hand-carrying or shipping item(s)?

Am I traveling to an <u>OFAC Sanctioned Destination</u>? (Cuba, Iran, Syria, Sudan, North Korea)

Ensure a Restricted Party Screening is conducted on the place of visit and/or on the person(s) you are visiting. Presentations and discussions must be limited to topics that are not related to controlled items, software, or technology unless that information is already published or in the public domain.

Check the U.S. Department of State International Travel-Safety and Security.

During your visit or presentation, be aware of side conversations (including emails, phone calls, or in-person). Ensure discussions are on information that is publicly available.

Do not give advice to any foreign military without a review by the Export Controls Office; this could be considered a "defense service" per the International Traffic in Arms Regulations (ITAR).

Verify that your technology or information falls into one or more of the following categories prior to travelling (does not apply to tangible items):

- Research qualifies as fundamental research
- Information or software is publicly available
- Educational information

If you need help with categorizing, contact the Export Control Office.

Do not take any items, information, software, or technology that fall into any of the following categories:

- Controlled Unclassified or Export Controlled, Limited Distribution,
- Proprietary, Confidential, or Sensitive Data,

- Information received under a Non-Disclosure Agreement (NDA),
- Results from a project with contractual constraints on the dissemination specifically designed for military intelligence, space, satellites, encryption software, or nuclear applications, and/or
- Computer software received with restrictions on access or export to non-US Person(s)

Shipping

Prior to shipment, know your recipient* and the item(s) export classification (ECCN/ITAR).

If the shipment contains any items or data that are ITAR controlled or 500/600 series Export Control Classification Number (ECCN), notify the Export Controls Office for review prior to shipping. For ALL international shipments, notify the <u>Export Controls</u> <u>Office</u>

Receiving/Purchasing Export Controlled Items

(e.g. FLIR Camera)

Obtain classification of the item(s) and communicate with the Export Controls Office prior to finalizing the purchase order. Proper controls may need to be in place prior to receipt.

Tracking of the equipment with a chain of custody log (including receipt, changes in location, use, and appropriate disposal) may be required. Contact the <u>Export</u> <u>Controls Office</u> for disposal.

Violations

If you think there may have been a violation, contact the Export Controls Director: Tina Bosworth 558-1128 <u>tina.bosworth@uc.edu</u>.

The Office of General Counsel can also offer assistance, or the anonymous compliance hotline: (800) 889-1547