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| **The University of Memphis** | **Export Control and U.S. Economic Sanctions Policy** | |
| **POLICIES**  **draft** | |  |  | | --- | --- | | **Issued:** | Jan-09-2017 | | **Responsible Official:** | Executive Vice President for Research and Innovation | | **Responsible Office:** | Research Compliance | |  |

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|  | **Policy Statement** |

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| **Scope of the Policy** | The University of Memphis (“UofM” or “the University”) faculty, staff, visiting scientists, postdoctoral fellows, students, and anybody who is paid by or otherwise engaged by the University to conduct research, teach, or provide services at or on behalf of the University (collectively, “University personnel”), must comply with U.S. export controls and with this policy. In addition, University personnel are required to adhere to University procedures established to maintain institutional compliance with governing laws and regulations. |

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| **Institutional Commitment** | The University is committed to full compliance with United States (U.S.) export control laws and regulations (collectively, “export controls”).  Export controls apply to all persons in the U.S., and U.S. persons whether in the U.S. or traveling abroad. It is the responsibility of all University personnel (defined in Scope of the Policy section) to comply with this policy and export controls.  Compliance with export control laws is an obligation the University takes very seriously. Failure to comply with export control laws can result in significant institutional sanctions and penalties.  All University personnel must also understand that violating export control laws may result in individual criminal sanctions, and it is therefore incumbent upon everyone at the University to become familiar with this policy and the University’s procedures for operationalizing the policy. |

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|  | **Purpose** |

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|  | The purpose of this policy is to help ensure compliance with export controls by (i) heightening awareness and understanding of export control laws and regulations, (ii) highlighting how they apply in a university setting, and (iii) describing your compliance responsibilities and available resources. |

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|  | **Definitions** |

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| **Definitions of Key Terms** | |  |  | | --- | --- | | Deemed Export | EAR: Releasing or otherwise transferring “technology” or source code (but not object code) to a Foreign Person in the United States.  ITAR: Releasing or otherwise transferring technical data to a Foreign Person in the United States. | | Export Control Classification Number (ECCN) | Export Control Classification Numbers (ECCNs) are five character alpha-numeric designations used on the Commerce Control List (CCL) to identify dual-use items for export control purposes. An ECCN categorizes items based on the nature of the product and its respective technical parameters. | | Export (ITAR) | Export means:   (1) An actual shipment or transmission out of the United States, including the sending or taking of a defense article out of the United States in any manner;  (2) Releasing or otherwise transferring technical data to a Foreign Person in the United States (a “deemed export”);  (3) Transferring registration, control, or ownership of any aircraft, vessel, or satellite subject to the ITAR by a U.S. Person to a Foreign Person;  (4) Releasing or otherwise transferring a defense article to an embassy or to any of its agencies or subdivisions, such as a diplomatic mission or consulate, in the United States;  (5) Performing a defense service on behalf of, or for the benefit of, a Foreign Person, whether in the United States or abroad; or  (6) A launch vehicle or payload shall not, by reason of the launching of such vehicle, be considered an export for purposes of this subchapter. However, for certain limited purposes (see §126.1 of this subchapter), the controls of this subchapter may apply to any sale, transfer or proposal to sell or transfer defense articles or defense services. | | Export (EAR) | Export means:    (1) An actual shipment or transmission out of the United States, including the sending or taking of an item out of the United States, in any manner;  (2) Releasing or otherwise transferring “technology” or source code (but not object code) to a Foreign Person in the United States (a “deemed export”);  (3) Transferring by a person in the United States of registration, control, or ownership of:  (i) A spacecraft subject to the EAR that is not eligible for export under License Exception STA (i.e., spacecraft that provide space-based logistics, assembly or servicing of any spacecraft) to a person in or a national of any other country; or  (ii) Any other spacecraft subject to the EAR to a person in or a national of a Country Group D:5 country. | | Foreign Person(s) | Any natural person who is not a citizen of the United States, a lawful permanent resident, or who is not a protected individual. It also means any foreign corporation, business association, partnership, trust, society or any other entity or group that is not incorporated or organized to do business in the United States, as well as international organizations, foreign governments and any agency or subdivision of foreign governments (e.g., diplomatic missions). | | Fundamental Research | **EAR: Fundamental research** means research in science, engineering, or mathematics, the results of which ordinarily are published and shared broadly within the research community, and for which the researchers have not accepted restrictions for proprietary or national security reasons.    **ITAR:** **Fundamental research** is defined to mean basic and applied research in science and engineering where the resulting information is ordinarily published and shared broadly within the scientific community, as distinguished from research the results of which are restricted for proprietary reasons or specific U.S. Government access and dissemination controls. University research will not be considered fundamental research if:  (i) The University or its researchers accept other restrictions on publication of scientific and technical information resulting from the project or activity, or  (ii) The research is funded by the U.S. Government and specific access and dissemination controls protecting information resulting from the research are applicable. | | Public Domain (ITAR) | Public domain means information which is published and which is generally accessible or available to the public:  (1) Through sales at newsstands and bookstores;  (2) Through subscriptions which are available without restriction to any individual who desires to obtain or purchase the published information;  (3) Through second class mailing privileges granted by the U.S. Government;  (4) At libraries open to the public or from which the public can obtain documents;  (5) Through patents available at any patent office; or  (6) Through unlimited distribution at a conference, meeting, seminar, trade show or exhibition, generally accessible to the public, in the United States; | | Published (EAR) | (a) Except as set forth in paragraph (b) of this section, unclassified “technology” or “software” is “published,” and is thus not “technology” or “software” subject to the EAR, when it has been made available to the public without restrictions upon its further dissemination such as through any of the following:  (1) Subscriptions available without restriction to any individual who desires to obtain or purchase the published information;  (2) Libraries or other public collections that are open and available to the public, and from which the public can obtain tangible or intangible documents;  (3) Unlimited distribution at a conference, meeting, seminar, trade show, or exhibition, generally accessible to the interested public;  (4) Public dissemination (i.e., unlimited distribution) in any form (e.g., not necessarily in published form), including posting on the Internet on sites available to the public; or  (5) Submission of a written composition, manuscript, presentation, computer-readable dataset, formula, imagery, algorithms, or some other representation of knowledge with the intention that such information will be made publicly available if accepted for publication or presentation:  (i) To domestic or foreign co-authors, editors, or reviewers of journals, magazines, newspapers or trade publications;  (ii) To researchers conducting fundamental research; or  (iii) To organizers of open conferences or other open gatherings.  (b) Published encryption software classified under ECCN 5D002 remains subject to the EAR unless it is publicly available encryption object code software classified under ECCN 5D002 and the corresponding source code meets the criteria specified in §742.15(b) of the EAR. | | Release | EAR: “Technology” and “software” are “released” through: (1) Visual or other inspection by a Foreign Person of items that reveals “technology” or source code subject to the EAR to a Foreign Person; or (2) Oral or written exchanges with a Foreign Person of “technology” or source code in the United States or abroad.  ITAR: Technical data is released through: (1) Visual or other inspection by a Foreign Person of a defense article that reveals technical data to the  Foreign Person; or (2) Oral or written exchanges with a Foreign Person of technical data in the United States or abroad. | | Software | ITAR: Software includes but is not limited to the system functional design, logic flow, algorithms, application programs, operating systems, and support software for design, implementation, test, operation, diagnosis and repair. | | Specially Designated Nationals (SDNs) | OFAC maintains a list of individuals and companies owned or controlled by, or acting for or on behalf of, targeted countries. This list includes individuals, groups, and entities, such as terrorists and narcotics traffickers designated under programs that are not country-specific. Collectively, such individuals and companies are called "Specially Designated Nationals" or "SDNs." Their assets are blocked and U.S. Persons are generally prohibited from dealing with them. | | Technology (EAR) | Information necessary for the “development,” “production,” “use,” operation, installation, maintenance, repair, overhaul, or refurbishing (or other terms specified in ECCNs on the CCL that control “technology”) of an item. | | Technology Control Plan (TCP) | A TCP formalizes processes and procedures for University personnel using controlled products or technology. A TCP is implemented to ensure that controlled products and technology are not shared with or accessed by unauthorized personnel or otherwise exported without the necessary US government authorization. | | U.S. Person | Pursuant to the EAR and the ITAR a U.S. Person includes:   * any individual who is granted U.S. citizenship; or * any individual who is granted U.S. permanent residence ("Green Card" holder); or * any individual who is granted status as a "protected person" under 8 U.S.C. 1324b(a)(3); * any corporation/business/organization/group incorporated in the United States under U.S. law; * any part of U.S. government. | |

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|  | **Procedures** |

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| **Export Control Laws and Regulations Overview** | U.S. exports are regulated by three principal agencies: the U.S. Department of State, Directorate of Defense Trade Controls (DDTC) through the International Traffic in Arms Regulations (ITAR) and Arms Export Control Act (AECA); the U.S. Department of Commerce, Bureau of Industry and Security (BIS) through the Export Administration Regulations (EAR); and the U.S. Department of the Treasury, Office of Foreign Assets Control (OFAC), which administers economic sanctions and embargoes. U.S. export control laws regulate the transfer of tangible items, information, technology, software, and funds to destinations and persons outside of the U.S.  These laws also regulate the release of certain information and technology to Foreign Persons while they are in the U.S.  **A.  INTERNATIONAL TRAFFIC IN ARMS REGULATIONS (ITAR)**  The ITAR ([22 C.F.R. Parts 120-130](http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title22/22cfr120_main_02.tpl)) govern the export and re-export of defense articles, defense services, and related technical data from the U.S. to any Foreign Person, whether that person is physically located in the U.S. (a “[deemed export](https://www.brown.edu/research/conducting-research-brown/preparing-proposal/research-integrity/ori-staff-directory/export-control-policy#Deemed)”) or abroad.  An article or service may be designated as, or determined to be, a defense article or defense service if it:   * Is specifically designed, developed, configured, adapted, or modified for a military application; or * Does not have predominantly civil applications; or * Does not have a performance equivalent (defined by form, fit, and function) to those of an article or service used for civil applications; or * Is specifically designed, developed, configured, adapted, or modified for a military application, and has significant military or intelligence applicability.   Any item covered by the [U.S. Munitions List](http://www.ecfr.gov/cgi-bin/text-idx?SID=86008bdffd1fb2e79cc5df41a180750a&node=22:1.0.1.13.58&rgn=div5) (USML) cannot be exported or re-exported without an export license regardless of intended use (i.e., even if it will be used for civilian or non-military purposes). UofM does not permit the purchase of technology that is listed on the USML.  An exemption from this prohibition can be requested in writing, as described in section VII of this policy.  **B.  EXPORT ADMINISTRATION REGULATIONS (EAR)**  The EAR ([15 C.F.R. Parts 730 – 774](http://www.ecfr.gov/cgi-bin/text-idx?gp=&SID=2917546db760007642179d6411d8fd1f&mc=true&tpl=/ecfrbrowse/Title15/15CVIIsubchapC.tpl)) regulate the export and re-export of most commercial items, many of which are “dual-use” items.  These items include goods and related technology, including technical data and technical assistance, which are designed for commercial purposes, but which could also have military applications, such as computers, aircraft, and pathogens. In general, any item made in the U.S., or made outside the U.S. but with U.S. parts, technology, software, or know-how, will be subject to the EAR unless the item is solely under another agency’s jurisdiction (e.g., ITAR controlled). While almost every item located in the U.S. is subject to the EAR, only a very small number of items require a license to export.  The specific items subject to the export control restrictions under the EAR are identified on the Commerce Control List (“CCL”).  Exports of items identified on the CCL may require a license from the Department of Commerce, depending on the reasons for control applicable to the particular items (“list-based” controls), the country of destination, and the purposes for which the items will be used.  **C.  OFFICE OF FOREIGN ASSETS CONTROL (OFAC)**  OFAC is responsible for the administration and enforcement of economic and trade sanctions against targeted foreign governments, individuals, entities, and practices based on foreign policy and national security goals, including terrorists and international narcotics traffickers and those engaged activities related to the proliferation of weapons of mass destruction [31 C.F.R. §§ 500-599]. Trade sanctions may prohibit a number of activities of U.S. Persons abroad, such as the transfer of items and services “of value” and travel embargoes to sanctioned nations.  OFAC maintains the list of embargoed/sanctioned countries and a summary of the embargoes, which can be found [here](https://www.treasury.gov/resource-center/sanctions/Programs/Pages/Programs.aspx).  OFAC also maintains the [Specially Designated Nationals and Blocked Persons List](https://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx) of individuals and companies owned or controlled by, or acting for or on behalf of, targeted countries, as well as individuals, groups, and entities, such as terrorists and narcotics traffickers designated under programs that are not country-specific. Transactions with any entity, group, or individual on the SDN list are prohibited unless approved by an OFAC license. |

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| **Export Controls at The University of Memphis** | Consistent with the University’s mission, UofM is committed to free inquiry and the open exchange of ideas and information and to the open release of knowledge for the public good. As an accredited U.S. institution of higher education that adheres to these principles, UofM is able to take advantage of the Fundamental Research Exclusion (FRE) for research activities performed in the U.S., the Educational Information Exclusion, and the [Public Information Exclusion](https://www.brown.edu/research/conducting-research-brown/preparing-proposal/research-integrity/ori-staff-directory/export-control-policy#PIE).  A. *Fundamental Research Exclusion*  UofM relies on the Fundamental Research Exclusion (FRE) to allow all members of our academic community to participate in research activities and openly share and discuss research results. To qualify as “fundamental research” and therefore be exempt from export controls, research must be conducted free of any publication restrictions, access, or dissemination controls.   * The University as an entity, and you as an individual, must ensure that results can be openly published and made available to the academic community. * As a general rule, the University will not accept classified research, research with publication restrictions, or access restrictions based on nationality. * You should be careful when accepting proprietary information from a research partner, or when using controlled technology in the conduct of research. Both can jeopardize the FRE and may result in the research project becoming subject to export controls. This may put you, as an individual, at an increased risk of violating export control laws.   B. *Educational Information Exclusion*  As an institute of higher education as defined in [20 U.S. Code § 1001](https://www.gpo.gov/fdsys/pkg/USCODE-2011-title20/pdf/USCODE-2011-title20-chap28-subchapI-partA-sec1001.pdf), UofM takes advantage of the Educational Information Exclusion.  This exclusion shields general educational information that is typically taught in schools and universities from export controls. The Educational Information Exclusion allows for disclosure of information concerning general scientific, mathematical, or engineering principles commonly taught in schools, colleges, and universities [[ITAR 120.10(b)](http://www.ecfr.gov/cgi-bin/text-idx?SID=86008bdffd1fb2e79cc5df41a180750a&node=22:1.0.1.13.57&rgn=div5#se22.1.120_110)] OR disclosure of information released by instructions in catalog courses and associated teaching laboratories of academic institutions [[EAR 15 CFR §734.3(b)(3)(iii)](http://www.ecfr.gov/cgi-bin/text-idx?rgn=div8&node=15:2.1.3.4.22.0.1.3)].  C. *Public Information Exclusion*  Information and data that has been lawfully published and is accessible or available to the public is not subject to export controls. Note that the terms “published” or in the “public domain” are specifically defined in the [ITAR 22 CFR 120.11](http://www.ecfr.gov/cgi-bin/text-idx?SID=a8cf9a715c25c462244b2c7a8a153cdf&node=22:1.0.1.13.57.0.31.11&rgn=) and the [EAR §734.7](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=e375f9ea6a464cd4d05ce2cc08bd195f&r=SECTION&n=15y2.1.3.4.22.0.1.7) and in the definitions section of this policy. |

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| **Compliance Roles** | The Executive Vice President for Research and Innovation (EVP) is the Senior Official for UofM’s export control compliance program. The EVP oversees all research-related activities, including compliance functions such as export control. The EVP reviews and approves any exceptions to UofM’s commitment to open academic exchange, including granting approval for the use of ITAR-controlled technology at the University.  The Division of Research and Sponsored Programs is responsible for developing and implementing this policy and internal procedures. The University’s Export Control Officer (ECO) within the Division has direct day-to-day responsibility for administering UofM’s Export Control Compliance Program.  The Office of the General Counsel (OGC) provides legal counsel to the VPR and ORI on export control related matters. |

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| **Compliance Responsibilities** | As an individual, it is your responsibility to comply with export controls as well as applicable University policies and procedures. The ECO will assist you in assessing export control requirements on a case-by-case basis. If a license is required for a proposed export, the ECO will facilitate and coordinate the license application process. If a license is required, no export or deemed export can take place until a license is obtained.  Scenario-specific responsibilities are outlined in sections 1 through 9 below.  **1.   Purchasing Export Controlled items, materials, or software (collectively, “technology”) for use at the University of Memphis** When purchasing new technology for use in research or other academic activities, you should be aware that such products may be subject to export controls.  Compliance Responsibilities:   * As UofM does not permit the purchase of technology that is listed on the USML, it is each individual’s responsibility to contact the ECO if proposing or requesting to purchase or receive technology that is controlled under the ITAR. * The EVP must approve the use of any ITAR-controlled technology or technical data at the University. * If the use of ITAR-controlled technology or technical data is approved, the technology will be subject to a Technology Control Plan (TCP). * The purchase of ITAR-controlled technology using UofM’s Purchasing card (P-card) is expressly prohibited by UofM’s [P-card Policy](https://www.brown.edu/about/administration/policies/purchasing-card-policy-p-card). \*\*\*\*\*\*\*\*\*\*\*\*\*\*\*   **2.   Conducting Research involving export controlled technology** While most research conducted at UofM falls under the fundamental research exclusion (FRE), the FRE does not apply to export controlled technology or technical data that the University receives from other parties. Certain Foreign Persons may not be able to participate in research involving export controlled technology, or technical data without a license.  Compliance Responsibilities:   * The Principal Investigator (PI) or his/her designee must contact the ECO if conducting research involving export controlled technology or technical data. * The ECO will assist in determining license or other requirements and facilitate the acquisition of licenses. * The PI is required to comply with any stipulations in the export license and any other measures implemented by the ECO.   **3.   Developing new technology using export controlled technology or technical data** If you design, develop, and/or build new technology that uses export controlled technology or technical data, OR refurbish or disassemble technology that is export controlled, then the newly built technology will likely be subject to export controls. A comprehensive review by the ECO is advised to ensure that you do not violate export controls.  Compliance Responsibilities:   * The PI or his/her designee must contact the ECO if planning to design, develop or build new technology for primary military application OR if planning to develop or build a new technology that includes ITAR-controlled technology or technical data.   **4.   Deemed Exports – disclosing or transferring controlled technology or technical data to a Foreign Person in the U.S.** A license may be required to release certain information or technical data to a Foreign Person in the U.S. Examples of releases to Foreign Person (known as “deemed exports”) include providing access to controlled technology, by visual inspection or use, or providing access via tours of facilities, verbal exchanges of controlled technical data or information that grants access to controlled technology or technical data.  Compliance Responsibilities:   * If you have controlled technology or technical data, you are responsible for preventing deemed exports without an appropriate license. You must contact the ECO if you want to release controlled technology or technical data to a Foreign Person in the U.S. The ECO will work with you to determine licensing requirements. * If you are hosting visiting scholars, scientists, students, or trainees from comprehensively embargoed countries, you are strongly advised to contact the ECO to assist in evaluating potential deemed export risks.   **5.   Shipping or hand-carrying export controlled technology abroad** Shipping or hand-carrying export controlled technology to a destination outside the U.S. may require an export license.  Compliance Responsibilities:   * University personnel who wish to ship or hand-carry technology abroad, must first ensure that the technology does not require an export license. * University personnel can independently ascertain or verify a technology’s Export Control Classification Number (ECCN) with the vendor, but you must contact the ECO if the ECCN is anything other than “EAR99.” * When shipping biological, chemical, or other hazardous materials OR when shipping technology that is encapsulated or shipped in biological, chemical or hazardous materials, you must also follow shipping and handling policies and procedures implemented by the University’s Office of Environmental Health & Safety.   **6.   Shipping or hand-carrying technology to embargoed, sanctioned or otherwise restricted countries or end-users** Shipping or hand-carrying **any** technology, even if classified as “EAR99,” to an embargoed or sanctioned country or to a restricted end-user is prohibited without permission from the ECO.  Compliance Responsibilities:   * When activities, research, travel or collaborations involve an embargoed country, you must contact the ECO as early as possible to discuss licensing requirements. University personnel must become familiar with the list of [embargoed countries/regions](https://www.brown.edu/research/conducting-research-brown/preparing-proposal/research-integrity/international-travel-embargoed-country).   **7.   Travel or Research Outside the U.S.** Traveling outside the U.S. with certain items or equipment, such as laptop computers, encryption software, certain navigation systems, or thermal imaging cameras, may require a license or license exception depending on the travel destination. The sharing of personal knowledge or technical expertise in other countries (e.g., as a keynote speaker, visiting lecturer, etc.) may also invoke export licensing requirements. The ECO can assist with determining whether a license for provision of such services is required.  Compliance Responsibilities:   * If you travel outside the U.S. with physical items, materials and encrypted devices, it is your responsibility to ensure that the items, materials, and devices do not require an export license. * You can independently verify a technology’s ECCN with the vendor, but you must contact the ECO if the ECCN is anything other than “EAR99.”   **8.   International Financial Transactions** Certain financial transactions with restricted parties or Specially Designated Nationals, which includes but is not limited to individuals or entities from sanctioned or embargoed countries, may be prohibited.  Compliance Responsibilities:   * Before initiating financial transactions to a Foreign Person, you must ensure that the financial transaction is not restricted / prohibited.  If you require assistance in making this determination, contact the ECO for advisement.   **9.   Restrictive Trade Practices and Boycotts** The anti-boycott provisions of the EAR prohibit U.S. Persons or businesses from participating in any non-U.S. sanctioned foreign government boycott.  Compliance Responsibilities:  If you receive a request or agreement/contract that supports a restrictive trade practice or boycott imposed by another country, you must promptly report the request to the ECO who, in turn, is obligated to report it to the Department of Commerce. |

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| **Training and Education** | Training and education are the foundation of a successful Export Control Compliance Program. Well-informed University personnel minimize the likelihood that a violation of export controls will occur. The following training is mandatory and coordinated through RSP:   * If you are subject to a Technology Control Plan (TCP), you must complete an initial training, followed by annual refresher trainings. * If you have been found to be in violation of U.S. export controls or University policy, you must complete periodic training. * Mandatory training may also be assigned by individual departments, groups or offices on an as-needed or risk basis. |

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| **Record Keeping Requirements** | The University must retain certain documentation related to export controls in accordance with time periods set forth under applicable U.S. laws and regulations. The ECO has primary responsibility for retaining copies of export-related documentation, including, but not limited to, analyses of license requirements and related correspondence, notes and memoranda, for a minimum of five years from the date of export, re-export and transfer. Departments, programs and University personnel are also responsible for retaining export-related records and documentation, such as licenses and shipping documentation, for a minimum of five years from the date of export, re-export, or transfer. Records may be kept as electronic files or hard copies. |

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|  | **Links** |

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| **Further Resources** | * UofM’s Export Control website * U.S State Department – International Traffic in Arms Regulations (ITAR), 22 C.F.R. §§ 120 – 130 * U.S. Department of Commerce – Export Administration Regulations (EAR), 15 C.F.R. §§ 730 – 774 * U.S. Bureau of Industry and Security (BIS) * U.S. Treasury Department – Office of Foreign Assets Control (OFAC), 31 C.F.R. §§ 500 -599 * National Security Decision Directive 189 (NSDD 189) |

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|  | **Revision Dates** |

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|  | Jan-09-2017 (Working Policy Number: 1810) |

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|  | **Subject Areas:** |

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