Export Control Policy

PURPOSE AND SUMMARY

The University of Arizona (UA) recognizes that a critical component of its mission is supporting research as well as developing relationships and participating in the worldwide academic and business community to further the pursuit of knowledge. As a participant in such a diverse academic, research, and business community, UA is committed to complying with U.S. export controls laws and regulations that apply to its activities, including the International Traffic in Arms Regulations (ITAR), the Export Administration Regulations (EAR), and the Office of Foreign Assets Control (OFAC) regulations.

The EAR and the ITAR govern the shipment or transfer of export-controlled technical data, information, materials and equipment to destinations outside the United States, as well as the provision of access to certain export-controlled technical data, information, materials or equipment to non-U.S. persons within the United States. In addition, the OFAC regulations impose sanctions and embargoes on transactions or exchanges with designated countries, entities and individuals. Federal export regulations were designed to protect the economic vitality of the United States and in support of national security. Violations of the export controls laws can undermine efforts to protect against attack or prevent international criminal activity. The UA recognizes that these laws support vital national security, economic, and foreign policy interests.

POLICY

All individuals affiliated with UA who work with, or have access to, export-controlled technical data, information, materials and equipment are required to be familiar with and fulfill the requirements of the U.S. export controls laws and regulations by following applicable UA policies and procedures.

COMPLIANCE AND RESPONSIBILITIES

Penalties for export control violations are substantial, including significant fines, debarment from participation in federal contracting, loss of export privileges, and in some cases imprisonment. In addition to these severe penalties, the potential
reputational damage to an institution from violation of these laws could be difficult to repair, possibly resulting in lost opportunities for attracting world-class researchers and/or decreased access to research funding through private industry and government sources.

The University’s Export Controls Program (“UECP”), under Research Partnership Services in the Office for Research & Discovery under the authority of the Senior Vice President for Research at the University of Arizona, is responsible to manage and oversee institutional compliance with Export Controls regulations. The Director of UECP has been designated as UA’s primary Empowered Official for export controls with the authority to make export controls determinations and government license submissions on behalf of the institution. More information about export controls including procedures, training, forms, and additional resources can be found at http://orcr.arizona.edu/ec and by contacting UECP at export@email.arizona.edu.

**RELATED INFORMATION**

University of Arizona Export Controls Program

Export Administration Regulations (EAR)

International Traffic in Arms Regulations (ITAR)

Office of Foreign Assets Control (OFAC) regulations

**REVISION HISTORY**