Export Control Policy

POLICY INFORMATION

Policy Sponsors: Elizabeth R. Cantwell, Ph.D.

Senior Vice President, Research Innovation & Impact (RII)

Responsible Unit: Export Control Program

Phone: (520) 626-2437

E-mail: export@arizona.edu

PURPOSE AND SUMMARY

Supporting research, developing relationships, and participating in the worldwide academic and business community to further the pursuit of knowledge is a critical component of the University of Arizona (UArizona) mission. UArizona 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, transfer, and access of export-controlled technical data, information, materials, and equipment to non-U.S. Persons or entities (domestically and abroad). The OFAC regulations impose sanctions and embargoes on transactions or exchanges with designated countries, entities, and individuals. These federal regulations are in place to protect the economic vitality and national security of the United States. Violations of these laws can result in significant fines and penalties.

POLICY

All individuals affiliated with UArizona 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 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 Control Program ("UECP"), under the Vice President of Operations and the Senior Vice President Research & Innovation at the University of Arizona, is responsible to advise, manage, and oversee institutional compliance with Export Controls regulations. The Director is designated as UArizona'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, can be found at https://rgw.arizona.edu/compliance/export-control-program and by contacting UECP staff at export@arizona.edu.

Restricted Party Screenings: To remain compliant with federal regulations, UArizona conducts [Restricted Party Screenings (RPS)](#) to help prevent illegal transactions with foreign and domestic parties on the various federal government lists of restricted individuals, companies, and organizations. For example, all individuals affiliated with UArizona who work with international persons and entities must confirm via Restricted Party Screening that activities are permitted with collaborators.

Training: UArizona employees working on an export-controlled project with a Technology Control Plan (TCP) must complete the initial [export control training module](#) prior to working on a project and/or accessing export-controlled information. Agreements will not be processed by Contracting Services until training is confirmed as current and the TCP is in place. Refresher training is required every two years when an individual has access to export-controlled items.

Technology Control Plan: The purpose of a [Technology Control Plan (TCP)](#) is to control the visual, physical, or electronic access by unauthorized non-U.S. persons to certain export-controlled information, data, materials, software, and equipment. Before export-controlled work can begin, each project member must complete online export control training and receive a TCP briefing from Export Control Program personnel.

RELATED INFORMATION

[University of Arizona Export Controls Program](#)

[Export Administration Regulations (EAR)](#)

[ITAR - U.S Munitions List](#)

[Office of Foreign Assets Control (OFAC) Regulations](#)

REVISION HISTORY

Updated on 12 October 2020.