



University Export Control Guide for University Advancement

1. Introduction to Export Controls

Export controls are U.S. laws and regulations that restrict the release of certain items, technologies, software, or technical data to foreign nationals, countries, or entities for reasons of national security, foreign policy, or economic protection. At UNT, this is managed by the Research Security and Export Control Officer (RSECO) to ensure all activities align with federal requirements. This guide is not intended to train you in Export Control, but rather to help you know when to reach out to the RSECO. All university export control questions or concerns must be directed to the UNT RSECO or the Office of Research Integrity and Compliance (ORIC.)

Key concepts:

- **Deemed Exports:** The release or sharing of technical data to a foreign person within the United States or abroad is considered a deemed export to that person's country of citizenship.
- **Fundamental Research Exclusion (FRE):** Basic research intended for public dissemination may be exempt, but this must be evaluated by the RSECO.
- **Restricted Parties:** Screening for denied persons, entities, or embargoed countries is required.
- **CUI:** Controlled Unclassified Information that requires some measure of safeguarding.
- **Classified Information:** Information that requires the highest level of security protection.
- **Empowered Official:** Vice President of Research and Innovation.

University Advancement supports the institution's compliance with U.S. export control regulations by ensuring that fundraising activities, donor engagement, and gift acceptance processes do not create regulatory risks.

2. Responsibilities for University Advancement

Everyone plays a critical role in maintaining compliance. Below are key responsibilities for your department, as they relate to export control.

- **Restricted Party Screening:**

- RSECO works with advancement to conduct restricted party screenings of international donors and all gifts from a foreign source.
 - Gifts from a Foreign Source Advancement Services within University Advancement must report all gifts from a foreign source in accordance with Regents Rule 09.400. Further, in accordance with 20 U.S.C. §1011(f) and Texas Executive Order GA-48, all gifts from a foreign source with an aggregate value of \$250,000 or more within a calendar year must be reported to the U.S. Department of Education and the Texas Higher Education Coordinating Board. UA must coordinate with the Office of Research to ensure that foreign gift reports are appropriately submitted using the Federal Student Aid's Electronic Application in accordance with 20 U.S.C. §1011(f). All foreign gifts must be screened against prohibited source lists, ownership and control must be verified, the source of funds must be documented, required certifications must be obtained, and timely reports must be filed.
- **Fill a seat on the Research Security Committee:**
 - University advancement will continuously provide a representative to serve on the Research Security Committee.

3. Interacting with the University Export Control Office (RSECO)

The RSECO is your primary resource for guidance, reviews, and approvals. Here's how to engage effectively:

- **When to Contact the RSECO:**
 - For screenings of international donors and all gifts from a foreign source, and the associated reporting requirements. Assist RSECO and/or ORIC with the associated reporting requirements for all foreign gifts.
 - If you or anyone you supervise have any questions regarding export control.
 - If you are made aware of ANY possible export control violations (inadvertent or intentional) you are required to report these to the RSECO as soon as possible so they can offer support and guidance and investigate if further action needs to be taken.
- **Best Practices for Interaction:**
 - Provide full legal name of anyone being screened. If requested, provide additional identifying information.

4. Failure to Comply

- Failure to comply with UNT Export Control Policy 13.010 and applicable export control regulations may result in severe civil and criminal penalties for the University and individuals. Any individual who does not comply with this policy and applicable export control regulations may also be subject to disciplinary action up to and including termination, dismissal, or expulsion.

5. Resources and Contacts

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- Email: Margaret.cochran@unt.edu | oric@unt.edu
- Website: <https://research.unt.edu/support-units/research-integrity-and-compliance/export-control.html>

- **Additional Resources:**

- University Export Control Policy: <https://policy.unt.edu/policy/13-010>
- Bureau of Industry and Security EAR information: <https://www.bis.gov/regulations>
- Department of State ITAR information: <https://www.pmddtc.state.gov/>
- Training: available in CITI: <https://about.citiprogram.org/>

For any questions or to request a personalized consultation or training, contact the RSECO.