



University Export Control Guide for Grants and Contracts Administration

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.

The Grants and Contracts Administration (GCA) team may interact with Export Control by identifying controlled projects.

2. Responsibilities for GCA

GCA plays a critical role in maintaining compliance by being the first reviewers of grants and contracts and the first to determine whether or not there may be controls in place. Below are key responsibilities tailored to your position:

- Review research grants, contracts, and collaborations for controls such as DFARS clauses 7012, 7019, & 7021.

- Check contracts for citizenship requirements, publication restrictions, international travel restrictions and/or sponsor notification requirements.
 - If DFARS clauses indicating CUI and NIST 800-171 controls are present, the RSECO must be contacted first to determine if (1) CUI is present and (2) CUI cannot be negotiated out of the project. If CUI is present and cannot be negotiated out of the project, then a Technology Control Plan (TCP) will be drafted by the RSECO in coordination with PI and System IT. A TCP is required anytime CUI is part of the project.
 - GCA AVP complies all sec 117 reporting data.
 - Confirm that all key personnel on a proposal have completed research security training at the time of submission.
 - Submit items of question to the RSECO for ancillary review in GRAMS.
- **Restricted Party Screening:**
RSECO works with GCA to ensure restricted parties screenings are conducted for sponsors during pre-award.

Failure to comply can result in fines, loss of funding, or legal penalties for both individuals and the university.

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:**
 - Before initiating international collaborations, shipping items abroad, or hosting foreign visitors.
 - If you suspect an activity involves controlled items (e.g., [Specific Examples: sharing technical data with a foreign student]).
 - For annual compliance certifications or audits.
 - 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.
- **Interaction Process:**
 1. **Submit a Request:** email oric@unt.edu with details of the activity or question.
 2. Submit an Ancillary Review in GRAMS for item requiring RSECO review/approval.

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

Margaret “Meg” Cochran, UNT Research Security and Export Control Officer

- 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.