



University Export Control Guide for International Student and Scholar Services

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 Office of International Student and Scholar Services (ISSS) is a key compliance partner within the university's export control framework as its role extends beyond visa processing to actively support ORIC with international collaborations, travel, screenings, or deemed exports that trigger export control reviews.

2. Responsibilities for International Student and Scholar Services

ISSS plays a critical role in maintaining compliance at UNT. Below are key areas for collaboration with export control:

- **Deemed Exports**

- When processing H-1B visas for faculty, if there is a potential for access to controlled technology a deemed export questionnaire is submitted to the RSECO for review.
- RSECO will review and respond with approval or a request for further information.

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

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

- **When to Contact the RSECO:**
 - Before initiating international collaborations, shipping items abroad, international travel, or hosting foreign visitors.
 - To approve all deemed exports.
 - If you suspect an activity involves controlled items, data, or information, CUI or classified information. (e.g., [Specific Examples: sharing technical data with a foreign student]).
 - 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 for Deemed Export approval:**
 1. **Submit a Deemed Export Questionnaire:** email margaret.cochran@unt.edu with details of the activity or question (e.g., description of item/technology, destination, end-user).
 2. **Approval Timeline:** Expect a response within 2 business days for standard reviews; expedite for urgent cases. However, approval time may vary on a case-by-case basis.

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.