



# University Export Control Guide for Office of General Counsel

## 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 intended to highlight scenarios in which the Office of General Counsel (OGC) may be called upon to offer guidance 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 General Counsel (OGC) may be called on to provide guidance and support to on Export Control and other compliance issues.

## 2. Responsibilities for OGC

The OGC plays a critical role in maintaining compliance. Below are key responsibilities as they relate to Export Control:

### Provide Legal Guidance:

- Review and interpret regulations and executive orders.
- Provide legal guidance as needed on contractual issues, disciplinary proceedings, and questions regarding potential violations.
- Advise University leadership on issues pertaining to interactions with federal law enforcement and other government agencies.
- Provide a representative to serve on the UNT Research Security Committee.

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

The RSECO is your primary contact for export control issues. Here's how to engage effectively:

- **When to Contact the RSECO:**
  - If information is needed on a particular ongoing project involving export control.
  - If OGC determines that policy or export control manual updates are needed.

### **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](mailto:Margaret.cochran@unt.edu) | [oric@unt.edu](mailto: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 (BIS) 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.

