



University Export Control Guide for Principal Investigator

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.
- **Technology Control Plan (TCP):** a way to identify items that need certain protections and an outline of protection measures.

As a Principal Investigator (PI), you are responsible for ensuring compliance with U.S. export control regulations by identifying and understanding whether research involves controlled technology, software, or data; and collaborating with the RSECO to determine if the Fundamental Research Exclusion applies. PIs must prevent unauthorized sharing of export-controlled information through physical shipments, communications, or international travel, and implement a Technology Control Plan, when required. PIs are also expected to complete export control training, and they must ensure that all project personnel complete export control training. Additionally, PIs must consult the RSECO before engaging in international collaborations, shipping items abroad, or granting access to sensitive technology.

2. Responsibilities for Principal Investigator (PI)

PI's play a critical role in maintaining compliance. Below are key responsibilities of your position:

Understand Export Control Regulations and Identify Potential Export-Controlled Activities:

- Stay up to date on all required export control and research security training and ensure that anyone on your project is keeping their training up to date.
- Review research projects, collaborations, or equipment for controlled items.
- Collaborate with the RSECO to develop and adhere to a Technology Control Plan (TCP) if required by your contract.

Compliance in Daily Operations:

- Secure data, lab spaces, and equipment from unauthorized access.
- Ensure lab access, data sharing, shipments, personnel access, and training comply with the conditions of your contract and the parameters defined in your TCP (if applicable).
- Consistently brief team members on the importance of handling export-controlled information and compliance obligations.
- Report any suspected violations immediately to the RSECO.
- Register international travel and adhere to university protocols with laptops or research data as provided by RSECO and/or ORIC.
- Verify export control requirements with the RSECO before shipping any research materials internationally.
- Consult the RSECO and confirm compliance obligations when engaging in international collaborations.
- Maintain current research Security and export control training.
- Promptly report any personnel changes on controlled projects to the RSECO.

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, approval, and questions relating to export control and research security. Here's how to engage effectively:

- **When to Contact the RSECO:**
 - Before initiating international collaborations, shipping items abroad, international travel, or hosting foreign visitors.
 - If you suspect an activity involves controlled items, data, or information, CUI or classified information.
 - If an item you are working with requires export control classification.
 - If you or your project personnel require a targeted or additional export control training session.

- If you suspect an activity involves the unauthorized use of controlled items, data, or information, CUI or classified information.
 - If you, or anyone you supervise has 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 timely and detailed information to avoid delays.
 - Attend Responsible Conduct of Research (RCR) workshops or request consultations for proactive advice.
 - Make sure any required training is up to date.
 - Reach out as soon as you have questions or concerns.

4. Common Scenarios and Procedures for Principal Investigators

- **Scenario 1: A new postdoc is hired onto a controlled project**
 - Procedure:
 1. Notify RSECO immediately so TCP can be updated to reflect changes.
 2. Ensure that all project personnel have up to date export control training.
 3. Notify sponsor if required.
- **Scenario 2: A faculty member is working on a controlled project and needs to travel internationally.**
 - Procedure:
 1. Register travel:
https://riskmanagement.unt.edu/emergency/international_travel.html
 2. Fill out international travel device checklist.
 3. Review current project for travel stipulations.
 4. Contact RSECO with any questions regarding export controls and travel.

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.