



University Export Control Guide for Research Security Committee

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

2. Responsibilities for the Research Security Committee

The Research Security Committee (RSC) will discuss, formulate compliance recommendations, advise on various research security and international compliance related issues, and elevate recommendations to the VPRI and the Vice President, Chief Integrity Officer, as appropriate. The committee will monitor laws and regulations related to research security and international compliance, both non-research and research activities, domestic and international, and report significant impacts to UNT senior leadership.

Responsibilities for RSC Members:

- **Attend quarterly meetings**
 - Attend committee meetings and be an active participant in discussions. You serve on this committee to offer a unique perspective and subject matter expertise; the more involved our members are, the stronger our research security program will be.
- **Understand the research security policy framework and export control policies:**
 - Stay informed about changes to policy or regulatory updates that could influence Research Security issues.
 - Reach out to RSECO with any questions about policy or regulatory changes.
 - Familiarize yourself with the export control manual and review updates as needed.

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

The RSECO is your primary resource for questions regarding export control concerns.

Here's how to engage effectively:

- **When to Contact the RSECO:**
 - Before RSC committee meetings if you have agenda items contact the RSECO or the Director, Ethics & International Research Compliance.
 - Before initiating international collaborations, shipping items abroad, or hosting foreign visitors.
 - If you suspect an activity involves controlled items, or CUI or classified information.
 - For annual compliance certifications or audits.
 - If you 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.

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.