



University Export Control Guide for University Integrity & Compliance Office

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 identify situations where the RSECO should seek guidance and/or assistance from University Integrity & Compliance. . 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 University Integrity and Compliance office works closely with the Office of Research Integrity and Compliance in offering guidance and support on a range of issues, including resolving concerns specifically related to export control and research security.

2. Responsibilities for University Integrity and Compliance

Everyone plays a critical role in maintaining compliance. Below are key areas for collaboration:

- A representative from University Integrity and Compliance serves on the Research Security Committee.

- The University Integrity and Compliance office may be called on to participate in investigations and enforcement of protocols as needed.
- The University Integrity and Compliance office plays a key role in resolving issues and responding to executive orders and policy updates or convening senior leadership for UNT Research Security Committee recommendations.
- The University Integrity and Compliance office may be asked to provide guidance and support on policy or process changes.

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

The RSECO is UNT's primary resource for export control. Here's how to encourage others to engage effectively:

- **When to Contact the RSECO:**
 - If you suspect an activity involves controlled items, data, or information, CUI or classified information.
 - For annual compliance certifications or audits.
 - If you or those seeking assistance from you require a targeted or additional export control training session.
 - 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.