



University Export Control Guide for UNT System IT

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

As a UNT System IT Administrator, you play a critical role in implementing and maintaining the technical safeguards that protect controlled technology; specifically, system security plans outlined in a Technology Control Plan (TCP) and cybersecurity initiatives that involve export control.

2. Responsibilities for UNT System IT

UNT System IT plays a critical role in maintaining compliance. Below are key responsibilities UNT System IT has with regards to export control:

- **System Security Plan**

- Set up a System Security Plan (SSP) within secure research enclave. This plan will be referred to in the project TCP. UNT System IT Representatives will collaborate with RSECO and College level Information Technology during the TCP set-up process.
- Maintain compliance with CMMC and DFARS protocols.
- Liaise with RSECO and PI's on an as needed basis for certain projects that may have individualized information Technology security requirements.

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

The RSECO is your primary resource for guidance on Export control and research security questions. Here's how to engage effectively:

- **When to Contact the RSECO:**

- With any questions related to Export Control or information Technology set-up for sponsored projects.
- 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]).
- For annual compliance certifications or audits.
- 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.

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.