



Export Administration Policy

Effective Date: October 2001

Approval: January 8, 2015;
University President

Maintenance of Policy: Export
Administrator

PURPOSE: The purpose of this policy is to ensure compliance with U.S. Federal export control laws and regulations.

SCOPE: This policy applies to all University employees who intend to export U.S. commodities, technologies or technical data to a foreign country. This policy also applies to the sharing of technology or technical data with a foreign person, also known as a deemed export, whether it occurs inside the United States or abroad.

POLICY: The export, or deemed export, of U.S. commodities, technology or technical data is controlled by various federal laws and regulations and are enforced by a number of federal agencies.

The primary regulations of concern are the Export Administration Regulations (EAR) and the International Traffic in Arms Regulations (ITAR). The Department of Commerce enforces the EAR while the Department of State enforces the ITAR. Other agencies, such as the FBI, Department of the Treasury, Department of Homeland Security, and U.S. Customs and Border Protection may be involved in the enforcement of export controls and the investigation of export violations.

The University has established the Export Administration activity to aid the University community in complying with current export regulations. The primary function of Export Administration is to determine whether commodities, technologies or technical data require an export license from the Department of Commerce or Department of State prior to export, or whether one of several license exemptions may be used. All commodities and technical data must be reviewed by Export Administration prior to shipment.

Any employee who intends to export U.S. commodities, technologies or technical data must contact Export Administration so that a proper export compliance determination can be made.

REFERENCE DOCUMENTS:

1. Export Control Procedure
2. Technology Control Plan

APPLICABLE REGULATIONS:

1. Department of Commerce Export Administration Regulations;
2. Department of State International Traffic in Arms Regulations;
3. Export Administration Act of 1979, as amended;
4. International Emergency Economic Powers Act, as amended;
5. Arms Export Control Act, as amended

POLICY HISTORY:

Approved in its original form:
October 2001 (Titled: Memo 17 - Business Ethics and Integrity Policy);

Approved as amended: January 8, 2015

Export Administration Policy, (continued)

POLICY (continued):

RESPONSIBILITY FOR ENFORCEMENT, REMEDIES , SANCTIONS

All University employees are responsible for complying with U.S. export requirements. Severe civil and/or criminal penalties may result for both the employee and the University if export laws and regulations are violated. Other sanctions may include the denial of export privileges, debarment from federal contracts and seizure or forfeiture of property or goods.