

When Conducting Research Amid COVID-19, Don't Forget Export Controls

A refresher on rules governing activities with international collaborators and certain technologies.

July 16, 2020 -- Under these current and unprecedented circumstances, many UCF faculty, staff and students are collaborating and working remotely.

The Office of Export Controls Compliance (ECC) would like to help you conduct your work with as few interruptions as possible. ECC reminds the UCF community of the export control restrictions that may impact certain activities. ECC has policies and procedures in place to assist with identifying activities that may be impacted by the U.S. Export Control Regulations.

Any questions regarding a particular activity, should be directed to UCF Export Control Officer, Ashley Guritza, at Ashley.Guritza@ucf.edu.

Research: The U.S. Export Control Regulations limit the export of technology outside the U.S. and the release of certain technology to a foreign national in the U.S. A license may be required prior to releasing confidential or proprietary information to a foreign national or allowing a foreign national to participate on a restricted research activity. Whether an export license is required depends on a number of factors including, but not limited to, the technology involved, the applicable export regulations, and the sponsor contractual restrictions (if any).

Research subject to a Technology Control Plan: As a reminder, unless otherwise approved in writing by ECC, all work subject to a Technology Control Plan (TCP) may only take place in the locations identified in the applicable TCP and in accordance with the security measures outlined in the TCP. If you need to request modifications to your TCP, contact Guritza at Ashley.Guritza@ucf.edu.

Activities with embargoed countries: Pursuant to the Office of Foreign Assets Control, most activities, including, but not limited to, exports, services, and financial transactions, involving an embargoed country are highly regulated and are generally prohibited. Currently the following countries are considered embargoed countries; the Crimea region of the Ukraine, Cuba, Iran, North Korea, and Syria.

Activities with certain entities/persons: Pursuant to the Office of Foreign Assets Control regulations, regardless of the country, U.S. entities are prohibited from engaging in any activity with an entity or individual identified on the Specially Designated National and Blocked Person List.

International Shipping: As noted above, the U.S. Export Control Regulations limit the export of technology outside the U.S. Therefore, depending on the technology, an export license may be required before shipping something outside the U.S.

International Travel: In addition to the restrictions outlined above, the Florida Travel Act (Florida Statute Section 1011.90(6)), prohibits State-funded official travel to countries designated as "state sponsor of terrorism" (Iran, North Korea, Sudan, and Syria).

Foreign Influence: In addition to the requirements outlined above, there are federal restrictions in accepting federal funding and being part of a foreign talent program. In general, such programs include any foreign-state-sponsored attempt to acquire U.S. scientific-funded research or technology through foreign government-run or funded recruitment programs. When hiring personnel on federally funded projects, it's important to be cognizant of this. If an individual informs you that they are part of a talent program, you should immediately contact Guritza at Ashley.Guritza@ucf.edu. UCF has and continues to implement compliance measures to address foreign influence.

Updates and guidance are posted on the export control website at:
https://www.research.ucf.edu/ExportControl/contact_when.html .