

# University of Central Florida Export Control Management Plan



**Disclaimer:** The contents of this document have been prepared for the University of Central Florida (UCF) for informational purposes and are not intended to replace any regulatory document of interpretation or to relieve importers or exporters of their statutory responsibility to comply with current laws, regulations, policies, and procedures of the U.S. Government. Content may not apply to specific situations that occur outside of UCF or may be incomplete and does not constitute legal advice or the provision of legal services. Those outside of UCF should not act upon any material within this document without seeking professional counsel.

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## Section 1: Revision History

Revision	Date	Description of changes
1	1/20/2010	Initial
2	3/25/2014	Update with Revised ORC processes
3	11/12/2014	Removed internal procedures
4	7/16/2015	Edited Technology Control Plan
5	6/XX/2025	Update to Entire Plan

## Section 2: Applicability

The UCF Export Control Management Plan (ECMP) applies to all members of the University of Central Florida (UCF) community, including, but not limited to, employees, students, visiting researchers, and volunteers.

## Section 3: Purpose

UCF encourages and supports open research and the free exchange of ideas, but also recognizes that the United States has enacted export control laws that control the export and release of certain technologies and information outside of the U.S. and to Foreign Nationals within the U.S. export control laws and regulations exist to protect our country, its citizens, and the innovations of the U.S. for reasons of national security, foreign policy, and competitive trade. Although most UCF activities and research are exempt from export control laws, UCF engages in activities, research, and the development of new technologies that are subject to export restrictions. The application of export control laws requires a detailed analysis of UCF activities and research to determine the applicability of the export control laws and what requirements and restrictions may apply.

The UCF Export Control Management Plan (ECMP) is an instruction tool to document compliance protocols implemented at UCF for compliance with U.S. export control laws, regulations, and sanctions. Various departments and units have a role in complying with the U.S. export control laws and regulations. It is UCF's expectation that the UCF community understands the information in the ECMP and the importance of complying with the requirements outlined in the ECMP. The official copy of the ECMP will be maintained by the Office of International Collaboration and Export Control (OICEC) and will be updated and distributed as needed. The EMCP is also posted on the OICEC website at:

<https://www.research.ucf.edu/for-researchers/compliance/oicec/export-compliance/>.<sup>1</sup>

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<sup>1</sup> UCF acknowledges and appreciates Virginia Polytechnic Institute and State University and the University of Florida for granting UCF permission to alter selected portions of their export control compliance program guidelines" for use in this ECMP.

## **Section 4: Definitions**

### **A. Deemed Export**

Releasing or otherwise transferring technical information to a foreign national in the United States.

### **B. Empowered Official**

Authorized full-time permanent employees registered with the Department of State in accordance with federal regulation 22 CFR 120.25, who have independent authority to inquire into any aspect of a proposed export or temporary import, to verify legality and compliance with U.S. export control laws and sanctions, and to refuse to authorize or limit the transaction without prejudice or other adverse recourse.

### **C. Export**

The term export is defined in accordance with the Export Administration Regulations, the International Traffic in Arms Regulations, and other applicable export control regulations, but in general will be defined as sending or taking an item, material, technology, or technical information out of the U.S., the release of certain technology and technical information to a Foreign National, and/or providing assistance, including training, to a Foreign National, whether in the U.S. or abroad in the design, manufacture, installation, repair, or operation of a defense article.

### **D. Foreign National**

Any person who is not a lawful permanent resident of the United States, citizen of the United States, or any other protected individual as defined by 8 U.S.C. 1324(b)(3), including refugees and asylees.

### **E. Fundamental Research Exclusion**

For purposes of this policy, fundamental research shall be defined in accordance with the Export Administration Regulations, the International Traffic in Arms Regulations, and other applicable export control regulations, but in general will be defined as basic or applied research in science and engineering performed or conducted at an accredited institution of higher learning in the U.S. where the resulting information is ordinarily published and shared broadly in the scientific community. Fundamental research is distinguished from research that results in information restricted for proprietary reasons, national security reasons, or pursuant to specific U.S. government access and dissemination controls. Research that results from fundamental research is not subject to export controls.

### **F. Principal Investigator**

The faculty member, post-doctoral associate, graduate student, medical student, or other suitably trained individual responsible for the conduct of a particular research project. Any given project may have additional co- or sub-investigators. Undergraduate

students may not act as the Principal Investigator; the faculty supervisor must serve as the Principal Investigator and the undergraduate student is listed as a co-investigator.

## **Section 5: Applicable Regulations**

There are five main federal export control regulations, the International Traffic in Arms Regulations (ITAR), the Export Administration Regulations (EAR), the Nuclear Regulatory Commission Regulations (NRC Regulations), the Office of Foreign Asset Control Regulations (OFAC), and the Antiboycott Regulations. A summary of each set of regulations is provided below.

### **A. ITAR**

The ITAR regulate technology, information, and services that are considered military in nature. The ITAR are under the purview of the U.S. Department of State and regulate defense articles and defense services. Defense articles and defense services are identified on the United States Munitions List (USML).

Any person or entity who engages in the U.S. in the business of manufacturing, exporting, or temporarily importing defense articles or furnishing defense services is required to register with the Department of State. Registration is a mandatory prerequisite to process license applications or invoke other approvals for an activity regulated by the ITAR. Certain licenses or exclusions or other government approvals are required to employ or allow Foreign Nationals to participate in activities subject to the ITAR (see Deemed Exports).

Activities that involve defense articles or defense services that involve a Foreign National require a license or other government approval before the Foreign National is permitted access to the defense article or service activity. Pursuant to the ITAR, licensing requests to countries identified in 22 C.F.R. § 126.1, including, but not limited to, China, Cuba, Iran, North Korea, Sudan, and Syria are subject to a policy of denial.

If an individual or entity is unsure whether technology, information, or services are subject to the ITAR, the individual or entity can submit a Commodity Jurisdiction (CJ) Request to the Department of State.

### **B. EAR**

The EAR regulate material, technology, technical information, and software that are dual-use (i.e., predominantly civil applications but may also have military applications) or are strictly civil in nature. The EAR are under the purview of the U.S. Department of Commerce. “Dual-use” material, technology, technical information, and software that have both military, or civilian and commercial applications, but are not specially designed for military applications are identified on the Commerce Control List (CCL).

If not controlled by another U.S. export control regulation, all items of U.S.-origin, wherever located, are subject to the EAR. Foreign-manufactured goods are generally exempt from the EAR if they contain less than a de minimis level of U.S. content by value. Such de minimis levels are set in the regulations relative to the ultimate destination of the export or re-export. In addition, certain foreign manufactured goods that are the direct product of U.S. origin technology or are manufactured using machinery that was manufactured in the U.S. can be subject to the EAR.

The EAR require a license or license exception for the exportation of a wide range of items with potential “dual” commercial and military use, or otherwise of strategic value to the U.S. Items not listed on the CCL are designated as EAR99 and generally can be exported without a license, unless the export is to an embargoed country, or to a prohibited person or end-use.

Similar to the Department of State CJ process, if an individual or entity is unsure about the export control classification of material, technology, technical information, or software, the individual or entity can submit a Commodity Classification Request to the Department of Commerce.

#### **C. NRC Regulations**

The NRC Regulations regulate nuclear equipment and materials. The NRC Regulations are under the purview of the U.S. Nuclear Regulatory Commission.

#### **D. OFAC Regulations**

The OFAC regulate financial transactions, the exchange of materials and technology, and activities with embargoed/sanction countries, entities, and persons. In general, most of the activities with sanctioned entities/persons are prohibited. OFAC is under the purview of the U.S. Department of Treasury.

#### **E. Antiboycott Regulations**

The Antiboycott Regulations prohibit U.S. companies from entering into agreements that involve refusing to do business with a boycotted country or persons for boycott-related reason and/or furnishing information about any person’s business relationships with a boycotted country. If an individual or entity subject to U.S law receives an agreement with a prohibited antiboycott provision, the agreement must be reported to the U.S. Department of Commerce.

## **Section 6: Activities That Are Not Subject to Export Control Regulations**

The export control regulations only regulate certain transactions that involve controlled items, technology, defense articles or services. Items, articles, and services not identified in the regulations, or specifically excluded from the regulations, are not subject to export controls.

The following information is specifically excluded from the regulations:

- A.** Information that is legally in the public domain or publicly available, e.g., published information and software.
- B.** University Research that is fundamental research (see Section 14 below).
- C.** Marketing Information.
- D.** Educational information released in official catalogue courses and associated teaching labs of U.S. institutions of higher education.
- E.** Patent applications and open patent applications available at any patent office.

The above exclusions are defined slightly differently under each export control regulation. If there is a question of whether an exclusion applies, please contact OICEC at [OICEC@ucf.edu](mailto:OICEC@ucf.edu).

## **Section 7: Handling and Reporting Potential Export Compliance Problems and Violations**

Because of the complexity of the export control regulations, accidental or inadvertent violations of the regulations are possible. In research, a university may identify that a researcher or collaborator has violated the export control regulations. All U.S. export control enforcement agencies have voluntary disclosure procedures whereby a potential export violation may be self-disclosed. Self-disclosures are highly encouraged by the U.S. Government and may be considered a mitigating factor in determining whether to impose any penalties (see Section 8 below). A failure to submit a self-disclosure may also be considered as an aggravating factor, likely increasing the penalties levied upon an organization. The UCF community must immediately report to OICEC any suspected violations of the export control regulations, a UCF technology control plan, UCF Policy 4-209.1, *Export Control Policy*, or this ECMP. Reports can be made via phone at (407) 823-0114 or via email at [OICEC@ucf.edu](mailto:OICEC@ucf.edu).

Possible violations of the export control regulations, a UCF technology control plan, UCF Policy 4-209.1, or this ECMP will be investigated by OICEC under the investigative authority of University Compliance, Ethics, and Risk. Action will be taken according to the nature, severity, and scope of the offense. The export control officer and Empowered Officials have the authority to suspend or terminate research, teaching, testing, or other export activity if the

export control officer or Empowered Official determines the activity is not in compliance or will lead to noncompliance with export regulations or policy.

An investigation will examine the full scope of any potential violations, including, but not limited to:

- A. The potential violation, causes, aggravating circumstances, and mitigating circumstances;
- B. Parties involved, dates, places, locations, methods, export jurisdictions, means by which the possible violation was detected, type of possible export violation (physical, visual, oral, electronic); and
- C. Short term corrective actions implemented upon possible violation discovery.

An investigation will consist of three phases:

- A. Data preservation.
- B. Data collection and review.
- C. Interviews of relevant employees / participants.

Upon the conclusion of the investigative process, a formal report will be prepared. At a minimum, the contents of the report will include:

- A. A description of the subject and scope of the investigation.
- B. A description of each phase of the investigation.
- C. A chronology of the facts developed via the investigation.
- D. A description of remedial measures undertaken.
- E. A description of proposed corrective/preventative actions.

In accordance with the applicable regulations, UCF will report all potential violations of the export control regulations as soon as possible to the applicable agency. A copy of the report outlining the potential violation(s) will be shared with the UCF President, Office of General Counsel, University Compliance, Ethics, and Risk, and the UCF Office of Research.

## **Section 8: Penalties for Export Violations**

The civil and criminal penalties associated with violating export control regulations can be severe and can apply to both the individual and the university. Penalties can include loss of



export privileges, loss of research funding, administrative penalties, criminal penalties, and civil penalties. Anyone found to have engaged in conduct contrary to UCF Policy 4-209.1, *Export Control Policy*, including the requirements outlined in this ECMP, is subject to disciplinary action by UCF up to and including dismissal or termination from UCF.

## **Section 9: Institutional Commitment**

UCF is committed to compliance with U.S. export control laws, regulations, and sanctions including, but not limited to, the Export Administration Regulations (EAR), the International Traffic in Arms Regulations (ITAR), and the sanctions and embargoes imposed by the Office of Foreign Assets Control Regulations (OFAC). The UCF community must comply with all applicable U.S. export control regulations, this policy, and UCF export control requirements. The UCF community is responsible for the proper handling, transfer, access, storage, disposal, control and dissemination of export-controlled hardware, software, technology, and technical information to destinations and persons outside of the U.S., as well as in some cases, to Foreign Nationals in the U.S.

OICEC, under the Office of Research (OR), is the designated authority charged with compliance oversight of the U.S. export control requirements for UCF, including this ECMP.

## **Section 10: Export Control Policy**

UCF Policy 4-209.1, *Export Control Policy* (Export Control Policy), establishes roles, responsibilities, standards of conduct and procedures, including the creation of this ECMP. A copy of this policy is available online at: <https://policies.ucf.edu/documents/4-209.pdf>.

## **Section 11: Export Control Officer and Empowered Officials**

The director of OICEC, or designee, is the UCF export control officer. For purposes of the export control regulations, the UCF Empowered Officials are the provost and executive vice president for Academic Affairs, the vice president for research and innovation, and the director of OICEC, or designee.

## **Section 12: Organization Structure**

The UCF export control program is a distributed compliance program with certain critical functions spread across key departments and units located throughout UCF. Many of these units are embedded within administrative functions located in central administration and the business offices of colleges. Overall, the “footprint” or reach of export compliance is UCF wide and relies on OICEC for coordination, information distribution, and management of the program.

## **Section 13: UCF Roles and Responsibilities for Export Control Compliance**

UCF Policy 4-209.1 Export Control establishes roles and responsibilities for export control compliance at UCF.

### **A. OICEC**

OICEC, under the Office of Research, is the designated authority charged with compliance oversight of U.S. export control requirements for UCF. The director of OICEC and the UCF export control manager are the principal points of contact for export control compliance throughout UCF and are responsible for institutional-wide development, implementation, maintenance, management, and improvement of UCF export control processes. These responsibilities include, but are not limited to:

1. Creating and maintaining UCF's security procedures for handling export-controlled technology. This includes helping to develop and implement Technology Control Plans (TCPs) that outline how to securely access, use, store, and share technology.
2. Handling immigration-related export certifications and technology reviews. This includes reviewing information for foreign nationals (e.g., H-1B visa holders), coordinating with other departments (as needed) to obtain necessary information, and approving deemed export control attestation on behalf of UCF.
3. Identifying sensitive materials in research projects and working with researchers to determine if technology is export-controlled and the export control classification.
4. In accordance with export control regulations and UCF policies, setting up and managing systems to track export-controlled technology. This includes developing and implementing automated tools (e.g., Visual Compliance) to screen individuals and entities involved in export control activities.
5. Investigating export control issues.
6. Leading and approving how UCF carries out its institution-wide export control policies and procedures, including providing export control training and awareness to the UCF community.
7. Liaison with federal regulatory and investigatory agencies.
8. Maintaining and updating institutional export control registrations with necessary federal agencies.
9. Managing the support functions that OICEC provides to other UCF departments, including, but not limited to, reviewing agreements, research, travel, or shipments for export risks, monitoring UCF's export compliance, determining when licenses or exceptions apply, submitting requests for government guidance or licenses, and advising on export control policies.
10. Overseeing the daily operations of OICEC.

11. Preparing and submitting voluntary self-disclosures.
12. Researching export control laws and helping guide the UCF community on related issues.

## **B. Research administration units**

### **1. *Academic Affairs and the Office of Research***

OICEC reports to the vice president for research and innovation which reports up to the Office of the Provost. As such, the provost and the vice president for research and innovation are the UCF officials with oversight for UCF's compliance with export and sanction related regulations. The provost, vice president for research and innovation, and OICEC assist the UCF president in maintaining UCF's export control compliance.

### **2. *Contracts Office***

In coordination with OICEC, the Contracts Office assists in ensuring that all sponsored activities are managed in accordance with the Export Control Policy and this ECMP. Contracts Office personnel are trained to identify potential export control issues associated with potential agreements and to route all assessments to OICEC for final disposition.

### **3. *Facility Security***

OICEC collaborates with the UCF facility security officer to ensure there is a common approach to national security issues related to export control compliance. Suspicious contacts and other reportable events related to classified programs are forwarded to the facility security officer. Exports of classified information or articles are coordinated with the facility security officer pursuant to National Industrial Security Program Operating Manual (NISPOM) requirements.

### **4. *Research Compliance***

OICEC collaborates with Research Compliance to address any export control activities or concerns that may arise as part of the conflict of interest disclosure process and research misconduct investigation process.

### **5. *Research Foundation***

In coordination with OICEC, the Research Foundation assists in ensuring that certain activities are managed in accordance with the Export Control Policy and this ECMP. Research Foundation Office personnel are trained to identify potential export control issues associated with potential agreements, donations, and gifts and to route all assessments to OICEC for final disposition.

**6. *Sponsored Programs***

In coordination with OICEC, Sponsored Programs assists in ensuring that all sponsored activities are managed in accordance with the Export Control Policy and this ECMP. Sponsored Programs personnel are trained to identify potential export control issues associated with potential agreements and proposals and to route all assessments to OICEC for final disposition.

**7. *Technology Transfer***

In coordination with OICEC, the Office of Technology Transfer assists in ensuring that documents developed and maintained by the Office of Technology Transfer are managed in accordance with the Export Control Policy and this ECMP. Technology Transfer personnel are trained to identify potential export control issues associated with patent documents and agreements and to route all assessments to OICEC for final disposition.

**C. Central UCF administration**

**1. *Audit***

As needed, UCF Audit provides feedback to OICEC on compliance with export controls requirements during routine scheduled departmental and college audits. As needed, export information necessary for these audits is shared with UCF Audit so that a thorough examination can be conducted. On a case-by-case basis, UCF Audit conducts targeted research and data collection in close coordination with OICEC for investigations.

**2. *Compliance, Ethics, and Risk***

University Compliance, Ethics, and Risk facilitates the reach of the UCF export control program across campus by coordinating university-wide compliance activities and provides additional investigation and outreach support.

**3. *Environmental Health and Safety***

Environmental Health and Safety (EHS) manages UCF's compliance with EHS documentation and regulatory requirements related to biological agents, chemicals, and other hazardous materials. EHS coordinates with OICEC when accessing certain facilities at UCF and on any export control related questions.

**4. *Foundation***

In coordination with OICEC, the Foundation performs restricted party screening on international financial transactions for compliance with applicable export control restricted party regulations.

**5. *Human Resources***

Human Resources through UCF's electronic systems provides citizenship information to OICEC to allow OICEC to confirm citizenship status for all UCF employees.

**6. *Information Security***

The Office of the Chief Information Security Officer (CISO) is responsible for UCF's information security. Research Cyber Risk Management (RCRM) oversees cybersecurity compliance, recordkeeping, and implementation of the business processes and accountability to safeguard controlled unclassified information, including export-controlled technical information, across the research enterprise. CISO and RCRM coordinate with OICEC on information security requirements related to accessing and generating export-controlled technical information.

The Information Security Office reviews and approves sponsored account requests involving a Foreign National requiring access to UCF IT resources who are not UCF employees or students. Access requests are routed to OICEC for assessment to ensure applicable export control requirements are met. The Information Security Office coordinates UCF IT security protocols and UCF IT staff are embedded across campus. The Office is instrumental in data security. The Office conducts university-wide training concerning threats, methods to counter-threats and other data security methods.

**7. *Office of General Counsel***

The Office of General Counsel works closely with OICEC on legal issues associated with export control compliance.

**8. *Office of the Registrar***

The Office of the Registrar through UCF's electronic systems provides citizenship information to OICEC to allow OICEC to confirm citizenship status for all UCF students.

**9. *Tax Payable and Procurement***

Tax Payable and Procurement performs restricted party screening on international financial transactions for compliance with applicable export control restricted party regulations (e.g., Office of Foreign Assets Control Sanctions Regulations).

**10. *The SPOT***

The SPOT provides domestic and international shipment capabilities to UCF. All international shipments from a UCF unit are routed to OICEC for assessment to ensure applicable export control requirements are met.

**11. *UCF Global***

UCF Global provides services related to international studies, Memoranda of Understanding (“MOU”) between UCF and foreign institutions, study-abroad programs, employment- and student-related international travel, and international partnerships. UCF Global coordinates travel approvals and international agreement approvals with OICEC.

UCF Global also processes all visa requests on behalf of UCF. UCF Global submits all H1B and J1 visa application requests to OICEC for export control assessment. Sponsoring units are required to submit a questionnaire for assessment. UCF Global relies upon OICEC for I-129 (Petition for Nonimmigrant Worker) attestations. UCF Global coordinates with OICEC to review employees, visiting scholar and business visitor activity for compliance with export control regulations.

**D. College, research centers, and institute administration**

**1. *Vice Presidents, Deans, Department Heads & Directors***

Vice presidents, deans, directors, department heads, and chairs share the responsibility of overseeing export compliance in their respective departments, centers and institutes and work with OICEC to implement effective processes and controls to ensure export control compliance.

**2. *Faculty/Principal Investigators***

Prior to allowing individuals to engage in export-controlled activities, faculty and Principal Investigators are responsible for ensuring that individuals under their supervision are properly instructed in the handling of export-controlled technology, have signed all required export control documents, including, but not limited to, a technology control plan, and have completed the required export control training. Because faculty and Principal Investigators have expert knowledge of the type of information involved in a research activity, their participation in the export control process is critical.

OICEC will consult and assist faculty and Principal Investigators by:

- i. Assisting in preventing unauthorized sharing of export-controlled technology;
- ii. Assisting with the creation and implementation of Technology Control Plans (TCPs);
- iii. Assisting with the management of export control restrictions on Foreign Nationals' access to controlled technology until proper authorization is in place;
- iv. Assisting them in understanding export control compliance requirements;
- v. Determining how research-related technology is classified under export laws;
- vi. Ensuring UCF personnel are authorized to access export-controlled technology; and
- vii. Reviewing proposals and agreements for potential export control issues.

### **3. *UCF Personnel***

UCF personnel including staff, students, post docs, and visiting scholars provide critical support to export controls by assisting UCF in identifying potential export control red flags and forwarding those red flags to OICEC for assessment.

## **Section 14: University Research**

While export control compliance is broader than just university research, export control restrictions impact university research more than most other areas of the university. With that said, the majority of the research at UCF constitutes Fundamental Research (as defined above) and the results of such research may be published freely or shared within the academic community. Fundamental Research does not apply when UCF agrees to certain publication, dissemination and/or access restrictions as part of the research.

Both the ITAR and the EAR provide that information published and generally accessible to the public through fundamental research is not subject to export controls. However, there are limitations. The Fundamental Research exception does not apply to items and articles taken outside the U.S. or items/articles that are fabricated as part of Fundamental Research.

Where the Fundamental Research Exclusion is not applicable, universities are required to determine the export classification of the technology involved or resulting from the research and to comply with all applicable export licensing requirements. In instances where the research involves export-controlled technologies, the Deemed Export provisions of the export control regulations can apply and can require universities to establish access controls to ensure that Foreign Nationals do not participate in or have access to the controlled research unless an export control license or license exception is obtained.

Transfers or release of export-controlled information in the university research environment may occur as a result of:

- A. A conversation (in-person or telephone).
- B. A demonstration, briefing or presentation.
- C. Allowing virtual or physical access.
- D. Carrying a laptop or other electronic device with controlled technical information or software out of the country.
- E. Collaborating with foreign collaborators.
- F. Design reviews.
- G. Faxes or letters.
- H. Laboratory or plant visits.
- I. Photographs.
- J. Posting non-public technical information on the internet.
- K. Surreptitious attempts, such as unsolicited inquiries
- L. The exchange of electronic technical information.

Application of the Fundamental Research Exception must be consistent with UCF Policy 4-209.1, Export Control. As outlined above and in the procedure section below, compliance reviews are conducted by the Contracts Office, Sponsored Programs, and OICEC. The final determination of whether a program qualifies for the Fundamental Research Exception can only be determined in writing by OICEC. When determining whether a research activity qualifies as fundamental research, OICEC will consider the inputs, conduct, and outputs related to the activity.

## **Section 15: Processes and Procedures**

OICEC maintains and manages detailed processes and procedures utilized to identify and manage export-controlled activities across UCF. Outlined below is a summary of those protocols. Copies of the below protocols, instructions and forms are shared with applicable UCF units and can be obtained by contacting OICEC at [OICEC@ucf.edu](mailto:OICEC@ucf.edu).



#### **A. Export Control Protocols**

1. ECO-1 Export Control Assessment
2. ECO-2 Comprehensive Assessment
3. ECO-3 Assessment Findings and Notifications
4. ECO-4 Technology Control Protocol
5. ECO-5 Technology Control Plan Revisions
6. ECO-7 Technology Control Plan Monitoring
7. ECO-8 Technology Control Plan Closeout
8. ECO-12 NRA Visa Adjudication
9. ECO-15 Restricted Dissertations
10. ECO-20 Restricted Project Payroll Report
11. ECO-21 DD Form DD 2345
12. ECO-22 Export Control Training
13. ECO-26 Iran Guidance
14. ECO-29 Standardization of Electronic Folders
15. ECO-33 CITI Training Certificate Expiration Audit and Notification

#### **B. Instructions**

1. ECO.INST-5 CITI Export Control Training
2. ECO.INST-6 Foreign National Volunteers
3. ECO.INST-7 Training Escalation Instruction

#### **C. Templates**

1. Technology Control Plan Template
2. Technology Control Plan Light Template
3. Technology Custodian Agreement Template
4. Export Assurance Terms and Conditions

### **Section 16: Training and Education**

At a minimum, all UCF employees, students, visiting researchers, and volunteers accessing or generating ITAR controlled technology or 500/600 Series EAR controlled technology must complete the OICEC required export control training course prior to accessing the controlled technology. This course must be completed every two years. In accordance with UCF policy and contractual requirements, at the discretion of OICEC, other UCF employees, students, visiting researchers, and volunteers may also be required to complete an OICEC export control training course.

In addition, OICEC offers live and virtual export control training to all departments and units at UCF. Furthermore, UCF has established a website at: <https://www.research.ucf.edu/for-researchers/compliance/oicec/export-compliance/> that includes instructions for training modules and reference materials for the entire UCF community.

## **Section 17: Monitoring**

UCF is registered with the federal government as a defense manufacturer and has designated OICEC to monitor UCF'S export control compliance. OICEC monitors UCF technology control plan compliance on a biweekly basis. In addition, in accordance with OICEC protocols, OICEC periodically selects a research laboratory that is subject to a UCF technology control plan for comprehensive assessment.

## **Section 18: Recordkeeping**

The functional administrative unit at UCF charged with the responsibility for oversight of compliance and recordkeeping of all applicable exports and regulated transactions is OICEC. At a minimum, all required export documents will be maintained for at least five years.

## **Section 19: Contact**

For questions regarding this ECMP please contact the Director of OICEC at (407) 823-0114 or [OICEC@ucf.edu](mailto:OICEC@ucf.edu).

## **Section 20: Initiating Authority**

Th initiating authority for this ECMP is the Vice President for Research and the Director, OICEC.

## **Section 21: Resources**

[U.S. Department of State, Directorate of Defense Trade Controls](#)

[U.S. Department of Commerce, Bureau of Industry and Security](#)

[U.S. Department of Treasury, Office of Foreign Assets Control](#)

[Consolidated Screening List](#)

[OICEC - Office of Research](#)

[UCF Policy 2-900 International Academic Agreements](#)

[UCF Policy 2-903 International Travel](#)

[UCF Policy 2-901 UCF Policy for All Foreign Nationals](#)

[Export Control Policy](#)