



MEMORANDUM

DATE: April 24, 2017

TO: All Faculty, Staff and Administrators

FROM: Rebecca Puig, Ph.D.
Senior Associate Vice President for Research & Innovation

RE: **University of South Florida Commitment to Export Control Compliance**

The University of South Florida System (USF System) is committed to an open teaching and research environment with the ability to publish research results freely. While most education and research can be conducted without restrictions, these activities sometimes involve sensitive technologies or produce results that have implications for export controls.

[USF System Policy 0-316](#) outlines the commitment to compliance with all export control laws and regulations, including but not limited to, the Export Administration Regulations (EAR), the International Traffic in Arms Regulations (ITAR) and applicable U.S. sanction regulations governed by the Office of Foreign Assets Control (OFAC). These laws and regulations apply to all university activities and it is critical that everyone in the USF System understands and complies with them fully. Compliance with these laws and regulations is vital in an effort to protect national security and foreign policy interests of the United States. The USF System Office of Export Controls is available to assist with compliance related to activities including international shipping, travel, visitors and partnerships, as well as activities involving controlled items, and much more.

Export control regulations apply to the transfer or “export” of specified materials, information, items or technology outside the U.S.; the disclosure of certain information to foreign nationals inside the U.S. (“deemed exports”); the training or offering of services involving controlled equipment or information to foreign nationals (“defense services”); and transactions with certain foreign countries or individuals who are on an embargo or restricted parties list. Some research activities on campus are exempt from export controls by employing exclusions such as the “fundamental research exclusion.” Other exemptions apply to education including the presentation of information taught through courses held on campuses in the U.S., and information that is already in the public domain or publicly available.

The USF System is committed to a diverse community comprised of both national and international students, faculty and staff. While the USF System’s intent is to foster education and research in an open environment, it is important to remember that the delivery of items and

services to individuals located in foreign nations, especially comprehensively sanctioned countries, may need additional approval from the appropriate government agency. Current comprehensively embargoed and sanctioned countries include North Korea, Iran, Cuba, Syria and South Sudan. The USF System has worked diligently to provide guidance to faculty and staff regarding individuals located in certain comprehensively sanctioned countries through the implementation of policies, such as [USF System Policy 10-067](#) on Distance Learning.

Travel and activities related to comprehensively sanctioned and embargoed countries have been in place for many years, some dating back to the 1960's. While most activities are not allowable due to these regulations, general or specific licenses approve some transactions. For example, general licenses authorize activities related to the publication of information and informational materials between most individuals in the United States and Iran, Cuba, or Syria. Additionally, general licenses are available for use to travel to Cuba in 12 areas, allowing our faculty and students to participate in research and educational experiences in Cuba. However, prohibitions still exist on the some exports of physical items from the US to Cuba and import of research samples from Cuba to the US. Many of these exports and imports require specific case-by-case license applications. The USF System Office of Export Controls manages the application of general and specific licensing activities.

The USF System is committed to finding the proper balance between complying with federal regulations and fostering a free and open environment necessary for research and teaching. Export control laws and regulations are complex and change frequently. Therefore, it is important to consider each situation individually. The USF System Office of Export Controls is available to visit faculty meetings and provide further information on how export controls relate to specific colleges and departments on campus. Please contact them to schedule an informational session for your area. For additional information, tools to assist in determining if export controls apply to your activity, and updated copies of the USF System export control manual and policy, please visit research.usf.edu/export-controls.

We look forward to working with you and assisting in your efforts to perform research and teaching activities successfully. Thank you for your support and cooperation.