

# Export-Controlled Activities



# How do export control regulations impact AME?



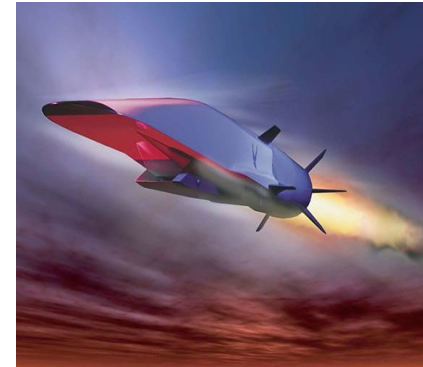
## **WHO**

Regulations impacting people, organizations, universities with which UA collaborates.



## **WHERE**

Countries involved in travel, shipping, or other activities.



## **WHAT**

Regulated items, data, materials, equipment, technology, software, and research.

# WHO

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## International:

- Individuals
- Universities
- Organizations

## Collaborations:

- Research
- Services
- Micro-campuses
- DCCs
- Visiting Scholars
- Donors



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# WHO: Risk

There are multiple US government lists of individuals and organizations designated as restricted entities. Working with them generally requires federal approvals.

Unfortunately, with increasing awareness (and concern) of the openness of research collaborations, academic relationships are facing scrutiny by federal authorities. We need to be mindful of entering affiliations with international entities with reputations of academic misappropriation and connections to activities that are deemed in opposition to US national interests.



# Restricted Party Screenings

- Individual & Affiliations  
(previous and current)
- BEFORE engagement



# WHERE: Sanctions & Embargoes

## Activities include:

- Conferences (even virtual)
- Research
- Joint publications
- Payments
- Remote or online classwork
  - Cuba
  - Iran
  - Syria
  - Russia
  - North Korea
  - Crimea
  - Belarus



Unfortunately, sanctions concerning China are increasing and something we need to be mindful of as we explore future opportunities to collaborate, create micro-campus, and other activities.



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# WHAT: ITEMS

Equipment, data, software with implications to national security, space, defense, or that may provide a national economic advantage.

*If you are working with items with military implications (certain GPS technologies are a great example for SBS)- please reach out to us.*



## Vulnerabilities

- Pcard purchases with potentially national security implications (GPS, drones, spectrometers, pXRF devices, etc.)
- International shipping of any items
- Software sent/shared abroad





A large, complex industrial machine, possibly a particle accelerator or fusion reactor component, is shown in a factory setting. The machine is composed of several large, cylindrical sections connected by a series of bolts and flanges. The background shows a typical industrial environment with overhead lights and structural beams.

# RESEARCH

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Export Control regulations concern the use, development, or modification of items with implications to national security, space, defense, or that may provide a national economic advantage.

This includes the development or modification of regulated items including: Technology, hardware, equipment, materials, software. This is the area that is least likely to impact SBS.

This pyramid shows the layers of controls, with classified research and information at the very top requiring the greatest levels of security, and between that and the export-controlled levels is CUI-Controlled Unclassified Information.

Classified

CUI

Export-controlled:  
ITAR

Export-controlled: EAR

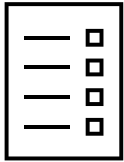
Fundamental Research

Expect CUI in two manners: 1. Researchers involved in federal projects and are not conducting sensitive work, but due to the project are exposed to sensitive CUI information. 2-Federal proposals or agreements may label as CUI. Do not forward, but notify Export Control ASAP when this occurs.

# DATA

**Risks of An “Export” is not just the shipping of a tangible item but the distribution of data and information concerning regulated items. This could occur through email, discussions, conference presentations, publications. This has not been an issue for SBS.**

# Summary



Restricted Party  
Screenings



Non-traditional  
funding & gifts



International activities  
(including micro-campuses &  
remote engagement)



Federal Proposals  
& CUI

It is important to know WHO you, your department, and your college are working with- including non-traditional funders and donors. Restricted Party Screenings on international donors, collaborators, and their ongoing and previous associations is important to identify Parties of Concern. If you think you might have a potential party of concern- please reach out to our office for assistance.

The travel registry does not capture personal travel where people may be conducting University business. Also, it is important to remember that a micro-campus agreement is only for educational activities and does not necessarily extend to research activities. If micro-campuses DO lead to shipments or research collaborations, please bring these to our attention for proactive review of export control considerations.



Intl students & visitors

Conferences

Remote Activities

Shipping

P-Cards

Research

Data

Micro-Campuses

Travel

Hiring

Equipment

International collaborations

Sanctions



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