



University of South Alabama
Office of Research Compliance and Assurance
Export Control Management Policy

Revised May 2013

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**University of South Alabama Policy Governing U.S. Export and Sanction Laws
Office of Research Compliance and Assurance**

The US Commerce Department must issue export license, or provide an exception to or exclusion from license requirements before any controlled tangible item, software, or information on the Commerce Control List (CCL) may be exported. Likewise, if the item in question is on the US Munitions List (ML), the US State Department must issue or provide for an exception to or exclusion from licensing requirements. Sending controlled items or information to a sanctioned country or individual as defined by the Office of Foreign Assets Control (OFAC) is generally prohibited in all forms.

Key Definitions:

Controlled Item(s): Includes any information, technical data, oral/written disclosure, or visual inspection of items or descriptions contained within federal regulatory lists governing export controls. These lists are principally the Commerce Control List and United States Munitions List.

Deemed Export Release of controlled technology to a foreign national in the United States is “deemed” to be an export as if it is released to the foreign national’s country of origin regardless of the physical location of the foreign national.

Empowered Official A U.S. citizen who is legally empowered to sign export license applications or other requests for approval on behalf of the University of South Alabama who understands the provisions and requirements of the various export control statutes, regulations, and penalties for violating export control laws. The Vice President for Research is the “Empowered Official” for the University.

Export: Defined very broadly to include an oral or written disclosure of information, visual inspection, or actual shipment outside the U.S. of technology, software/ source code or equipment to a foreign person or entity.

Foreign National Any person who is not a U.S. citizen, lawful permanent resident alien (green card holder), refugee, protected political asylee, or someone granted temporary residency under amnesty. This includes any foreign government, foreign corporation, or entity that is not incorporated or organized to do business in the U.S.

Fundamental Research 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.

University research will not be considered fundamental research if:

- 1) The University or its researchers accept other restrictions on the publication of scientific and technical information resulting from the project or activity, or

2)

Commerce Department Export Administration Regulation (EAR)
15 CFR 730-774, govern the export of items or technologies that are commercial or "dual-use" in nature, such items are found on the Commerce Control List (CCL) and anti-boycott regulations
<http://www.ecfr.gov/current/title-15/chapter-I/subchapter-D/part-730>

Treasury Department Office of Foreign Asset Control (OFAC)
CFR 500-599, administers and enforces economic and trade sanctions based on U.S. foreign policy and national security goals against targeted foreign countries, terrorists, international narcotics traffickers, and those engaged in activities related to the proliferation of weapons of mass destruction.
<http://www.ustreas.gov/offices/enforcement/ofac/>

Statement of Policy

In its endeavor to conduct research, promote scholarly works, and conduct business transactions, USA will comply with all U.S. export control laws and regulations, including those implemented by the U.S. Department of Commerce through its Export Administration Regulation (EAR) and the U.S. Department of State through its International Traffic in Arms Regulations (ITAR), as well as, embargo regulations imposed by the U.S. Treasury Department through its Office of Foreign Asset Control (OFAC). Export controls restricting a foreign national's participation in university research within the United States generally do not apply to the conductor results of fundamental research. Such practices, as defined and stipulated, include openly conducted basic and applied research in science and engineering that is not subject to access, dissemination, or participation restrictions of any sort.

However, in the case of release of tangible items, software, or information controlled by federal agencies outside the U.S., travel of persons outside the U.S. on projects that accept restrictions based upon nationality or publication, USA has a responsibility to:

- x Conduct a technical review and if necessary
 1. Document an express determination that an exception to export licensing is applicable; or
 2. Obtain an export license; or
 3. Develop a Technology Control Plan with the Principal Investigator; or
 4. Update the I

can be applied

the time of the exchange.

There are five issues that affect whether an export license is required:

- (1) Which government department has jurisdiction over the item sent, the Department of Commerce's Bureau of Industry and Security (BIS), the Department of State's Directorate of Defense Trade Controls (DDTC), or neither;
- (2) What item will be exported;
- (3) Where the item will be exported to;
- (4) Who will receive the item; and
- (5) What the item will be used for after receipt

The Office of Research Compliance and Assurance arranges for appropriate support to address export control and license issues, in consultation with the Empowered Official who is the authorized official to sign license applications on behalf of the State, Commerce, and Treasury Departments. Licenses normally take from 2-6 months from submissions of application to issuance.

Cloud Computing

USA uses a Google server for electronic correspondence (e-mail). Because Google's servers can be located anywhere and can be operated by anyone hired by Google, any information transmitted electronically or stored on a Cloud server (Drive, in the case of Google) is considered a deemed export. The ownership of the information's security is in the hands of the recording to BIS regulation. Therefore, ORCA recommends PIs not communicating any potential export controlled, restricted, or sensitive information, data, voice-mail or storing it on the Google Drive (or any Cloud-based system) until further notice is received that USA has procured a secure solution for such activities.

No "Side Deals"

The mission of a research institution and the very essence of science require constant communication, much of it informal. That said, it is easy for these communications to transgress into informal agreements made between researchers and sponsors with respect to the discretion of the researcher (e.g., not to submit research articles for publication, until they have been approved by the sponsor). **Such an informal agreement, however, can invalidate the fundamental research exclusion, thereby potentially exposing the researcher, as well as the institution, to the onerous penalties that may follow from a violation of export control laws.** Every researcher needs to clearly understand that compliance with the export control laws is not discretionary and to ignore them as not being applicable to one's own behavior is to invite serious consequences, which may include both civil and criminal penalties and/or large fines assessed to both the University and the individual researchers, as well as the possibility of suspension of certain research programs.

Restricted Party Screening

Various government agencies maintain lists of prohibited and sensitive end-users. Licenses generally are required to ship items to these end-users or to carry out a transaction in which a prohibited or sensitive end-user is involved in any way. In order to ensure that USAs doing business with people or companies who have been debarred, denied export privileges, or are otherwise on one of the numerous government "prohibited lists," the **University must screen ensure the export is not itself prohibited or being sent to a prohibited end user.** The University has purchased software called Visual Compliance that will conduct this assessment

Policy Implementation

The ORCA has developed the following processes and standard operating procedures to help Administrators, PIs, and other persons engaged in research at the University decide whether the EAR, ITAR and/or OFAC affect a particular research project and identify appropriate resulting action(s).

1. University Administration

The PI is the individual who bears primary responsibility for all essential aspects of the work being carried out, including technical aspects and completion of programmatic work, compliance with government, sponsor, and university policies and regulations, fiscal stewardship of sponsored funds, and all administrative requirements of the project. He/she must understand and comply with any export restrictions and must also ensure that all personnel working on his/her projects are also informed. The PI has primary responsibility for export compliance to include the following:

- x prior to commencing any research, reviewing and cooperating with the Office of Vice President for Research and the ORCA to determine whether any technical information or technology involved in his or her research is subject to the export control law or regulations and, if so, whether any exclusion is available under the export control regulations;
- x Re-evaluating that determination before changing the scope of or adding new staff to the project to determine if such changes alter the initial determination;
- x Making export determinations far enough in advance to obtain an export license from the appropriate agency, if required and available; and
- x Ensuring that foreign nationals are excluded from access to restricted data or technology until the availability of an exemption or exception has been determined or until an export license has been obtained.

The ORCA will assist PIs in assessing the application of such regulations, but primary compliance responsibility rests with the Principal Investigator of the research.

5. Sponsored Projects Administration (See SOP, Attachment A)

The Office of Sponsored Projects Administration (SPA) and the Office of Sponsored Programs (OSP) are responsible for the administration of sponsored projects. The Office of Sponsored Programs (OSP) is the primary point of contact for sponsored projects. The Office of Sponsored Programs (OSP) is located in the same building as the Office of Sponsored Projects Administration (SPA).

When requested, ORCA will seek council from USA's legal team to provide legal guidance and interpretation of export and sanction regulations and laws consultation regarding potential export control violations.

Violations of Laws, Regulations, and Policies

Possible violations of governmental laws/regulations will be investigated by university Empowered Official or designee. Action will be taken according to the nature, severity, and scope of the offense consistent with University policy. The University has the authority to suspend or terminate a research, teaching, testing, or other export activity if it is determined that the activity is not in compliance or will lead to noncompliance with existing export or sanction laws or policy. USA reserves the right to voluntarily contact authorities in the event of misconduct. Violations of U.S. export control laws and regulations can result in substantial criminal and civil penalties for both the individual involved in the violation (i.e., fines of up to \$250,000 per violation or imprisonment for 20 years) and substantial fines and penalties for USA. Violations also can result in the loss of export privileges for USA or for individuals involved in the violation.

Record Keeping Requirements

Departments or programs must keep hard copies of all export documentation, including financial records, shipping documentation, and appropriate certifications as defined by ORCA in their research files for a period of five years from the date of export, re-export, or controlled deemed

Policy Approval:

Lynne Chronister, Vice President for Research

Jean Tucker, Senior University Attorney

Dusty Layton, Director, Research Compliance and Assurance

Amy Delcambre, Assistant Director, Research Compliance and Assurance

Appendices: Standard Operating Procedures

Approved in collaboration with administrative offices

Adapted material from University of Arizona, Virginia Tech, Stanford University, and Massachusetts Institute of Technology

Appendices

Standard Operating Procedures:

[Attachment A:](#) Management of Export-Controlled Sponsored Projects

[Attachment B:](#) Management of Export Controls for International Student Admissions

[Attachment C:](#) Management of Export Controls and International Travel

[Attachment D:](#) Management of Export-Controlled Purchases

[Attachment E:](#) Management of Export-Controlled Technology Transfer

[Attachment F:](#) Process for Waiver of Publication Rights

[Attachment G:](#) Management of Export Controlled Projects Tracked by Grants and Contract Accounting

Management of Export-Controlled Sponsored Projects

APPENDIX A

Policy and Procedures

1. Purpose

The purpose of this document is to establish procedures to be followed in connection with Sponsored Projects Administrations subject to International Traffic in Arms Regulations (ITAR), Export Administration Regulations (EAR), Office of Foreign Assets Control (OFAC) Regulations or other applicable export control regulations.

2. Definitions

Foreign National Person: Any person who is not a U.S. citizen, lawful permanent resident alien (green card holder), refugee, protected political asylee or someone granted temporary residency under amnesty or Special Agricultural Worker provisions. Also any foreign government or any foreign corporation or entity that is not incorporated or organized to do business in the U.S.

Fundamental Research: Means 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 that is restricted for propriety reasons or national security reasons (EAR) and pursuant to specific U.S. government access and dissemination controls (ITAR)

Technology Control Plan (TCP) A plan, prepared by Principal Investigator and approved by the Unit, and reviewed by Office of Research Compliance and Assurance, for ensuring that there will be no unlawful export of restricted commodities, defense articles, software, data, technology, or technical data in a Sponsored Project without an appropriate government approval.

3. Responsible Research Administration Offices

The Sponsored Projects Administration (SPA), the Office of Health Systems Grants Administration and Development (HSGA), and the Intellectual Property Management (IPM) are responsible offices

5. Policy Administration

The Office of Research Compliance and Assurance and applicable Research Administration offices are responsible for ensuring that Sponsored Project proposals, contracts, and awards are identified and in compliance with applicable export control laws.

The Vice President for Research and the ORCA Director are responsible for this policy. The ORCA Director is responsible for issuing requests for export licenses, commodity jurisdiction requests, commodity classifications, and other documents required by applicable export control regulations that relate to Sponsored Projects.

6. Principal Investigator Procedures

The Principal Investigator (PI) must complete the Export Control section on the University Transmittal Form and is responsible for complying with applicable export control regulations and for preparing and implementing a project specific TCP for an identified export-controlled Sponsored Project. When a potential export control issue is identified by a Research Administration office, the Principal Investigator is referred to ORCA for a final determination of the export control regulation applicable to the project. The Office of Research Compliance and Assurance will assist the Dept, College, or Unit and the Principal Investigator in determining the appropriate export control management and, if the Sponsored Project is export control restricted in determining security measures needed to prevent unlawful export of export controlled software, technology, or technical data to foreign nationals or foreign persons without an appropriate license or other government approval. The Principal Investigator and Unit shall comply with the security measures in the TCP and annually certify to ORCA that they are complying with the TCP for each export controlled Sponsored Project for which they are responsible.

Principal Investigators must be aware that any "side" arrangement, contracts, terms, or clauses negotiated by the PI and sponsor without the express knowledge and/or approval of the Vice President for Research may jeopardize the University's fundamental research exclusion. The University of South Alabama will not honor, recognize or be bound by any such arrangement, contracts, terms, or clauses.

7. Pre-Award Proposal Processing Procedures

- x Review Requests for Proposals / solicitations to identify any export control, foreign

- x Enter into SPA database any publications restrictions, foreign national restrictions, export control restrictions (i.e., EARITAR, OFAC)
- x If applicable, the award acceptance sheet should indicate export control restricted research.
- x Whenever possible, negotiate to remove publication/access and contract specific national security restrictions to allow the Sponsored Project to be conducted as Fundamental Research, not subject to export control regulations.
- x Consult with PI and/or ORCA when changes are proposed to a Sponsored Project (i.e., personnel, or equipment added; venue or scope of work changed) that may involve export control regulations.
- x Obtain and include the Principal Investigator and Unit's signed TCP in an export control restricted award unless this requirement is waived in writing by the Director of OBA.

9. Office of Research Compliance and Assurance Procedures

- x Make the final determination if a Sponsored Project will require a TCP for export control regulations.
- x Advise the Unit, Principal Investigator, and SPA of any required TCP for any export control OR

Management of Export Controls for International Student Admissions

APPENDIX B

Policy and Procedures

Purpose

The purpose of this document is to establish procedures to be followed in connection with International Student Admissions subject to International Traffic in Arms Regulations (ITAR), Export Administration Regulations (EAR), Office of Foreign Assets Control (OFAC) Regulations or other applicable export control regulations.

Definitions

Foreign National Person: Any person who is not a U.S. citizen, lawful permanent resident alien (green cardholder), refugee, protected political asylee someone granted temporary residency under amnesty or Special Agricultural Worker provision; this includes any foreign government or any foreign corporation or entity that is not incorporated or organized to do business in the U.S.

Fundamental Research: Means 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 that is restricted for propriety reasons or national security reasons (EAR) and pursuant to specific U.S. government access and dissemination controls (ITAR).

Office of Foreign Assets Control (OFAC): The US Department of Treasury oversees US economic sanctions and embargos through its Office of Foreign Assets Control (OFAC). OFAC enforces trade, anti-terrorism, narcotics, human rights, and other national security and foreign policy based sanctions prohibiting the provision of anything of value to sanctioned countries, organizations, or individuals.

Responsible Research Administration Offices

The Department will screen applicants and identify those from sanctioned or embargoed countries/verify enrollment and can be tracked in Banner. In the event an international student should desire on campus employment payroll shall contact Director, International Admissions if a student PA submitted (ie, campus job). The ORCA is available for assistance or clarification if needed as to the guidelines for hiring international students involved in research.

Procedures

Admissions for International Students

International students are admitted to a ~~full~~ study in a specific program. Applicants who are not U.S. citizens must complete and submit an International Application for Admission (which includes submission of admission number and date from I-

bank letter. Certain transactions with individuals and entities banned by OFAC are prohibited. Visual Compliance can be utilized by the Office of International Student Admissions and/or ORCA to ensure no such payments occur with banned parties.

4. Full-time Status Requirement

International students in F or J1 status mp-d (-)Tj 0.002 Tcc 0 Tw 0.BDC -13.174 -1.293 Td [(l)17.8hra

Management of Export Controls and International Travel

APPENDIX C

TRAVEL POLICIES AND PROCEDURES

Background

USA requires prior written approval for all international related travel on USA-approved business – students (graduate or undergraduate) on study abroad (includes but not limited to “traditional” study abroad, research/field experiences and internships/service learning/work abroad for credit or approved by

Examples of this include employee foreign travel paid by an external agency which requires institutional approval for participation in the program (professional leave).

- Student foreign travel that is approved, reviewed, recommended or otherwise “sponsored/supported” by USA including but not limited to research, preceptorships, internships, service learning, and study abroad (includes activities which may not include academic credit or for which academic credit is awarded either as part of on campus courses (integrated), through other

- b. Restricted Party Screening review – including individual, company and blocked foreign nationals by country reports (provided by the Office of International Education per procedure approved by the Office of Research Compliance and Assurance)
- c. Trade Sanction country review (as identified by review noted in item b)
- d. 24/7 emergency assistance insurance enrollment including 24/7 worldwide call center services as well as unlimited coverage for medical evacuation, repatriation of remains, security evacuation and related support services.
- e. Completion of emergency contact and related foreign travel supporting information as requested.

2. The traveler receives the following from International Education

- a. OIE signed ITRF form – OIE does NOT approve or disapprove of travel only provides advisory information and recommendations regarding travel.
- b. Notifications of US DOS alerts/warning/security information
- c. 24/7 emergency assistance enrollment information
- d. Instructions for completion of review process (approval, etc..) by appropriate

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requests applicable to the approved travel. Note: no airline ticket purchases will be approved prior to the completion of the foreign travel authorization documentation.

10. Upon completion of travel - reimbursement traveler attaches a copy of fully approved request form to travel reimbursement request including copies of any additional documentation required.

Offices responsible for review and implementation of this policy:

- x VP Research
- x Senior VP Academic Affairs
- x VP Health Sciences
- x Research Compliance and Assurance
- x Risk Management
- x International Education
- x Financial Affairs

Attachments:

The form(s) attached are inclusive of the above policies, however, the form(s) may be revised from time to time without affecting the policy itself.

THE UNIVERSITY OF SOUTH ALABAMA

Policy Concerning Study, Travel, and Research in Countries

Under U.S. State Department Travel Warnings

As the daily lives of Alabamians are affected more and more by events around the world, in order to better serve the State and its citizens, The University of South Alabama has and is developing a global presence. Its students take advantage of opportunities for international education and research through organized study-abroad programs, more informal educational trips, and independent study and research funded in whole or in part by the University. Its faculty and staff participate in international educational and research opportunities, both to attain additional knowledge themselves, to share their expertise with other countries and to develop initiatives of the university in part or as a whole. The University is committed to becoming a premiere institution of higher education with a global presence.

As the University's contacts with the rest of the world expand, additional risk is inevitable as its activities are affected by war, terrorism, political unrest, disease, and natural catastrophes in other countries. The University endeavors to balance the value of participation in international educational activities against the potential risk to its students and employees of such participation. In balancing these factors, the University relies on information from the U.S. Department of State (and other agencies see note below *), most particularly the Travel Warnings issued periodically by that agency. Consequently, the University has developed this policy governing its educational and other activities in countries for which the Department of State has issued a Travel Warning.

Department of State Travel Warnings fall into several basic categories: (1) alerts or warnings of conditions that heighten the ordinary risk of travel to a particular country and (2) more urgent travel warnings that prohibit, restrict or otherwise urge U.S. citizens to defer travel to and or to depart that country. Additionally other sectors of the US government may place similar warnings and or restrictions in place such as the US Centers for Disease Control or the US Department of the Treasury Office of Foreign Assets Control (country sanctions program).

Therefore the following policies will be in place related to USA international travel for students, faculty and staff:

I. ALERT or “HEIGHTENED RISK” TRAVEL ADVISORIES: STUDENTS

No student shall be required to participate in an educational activity under University auspices in a country for which the Department of State has issued a Travel Alert. A student who wishes to travel, under University auspices, to a country for which the State Department has issued a “heightened risk” travel alert may do so, under the following conditions:

1. The student must review the Travel Alert and all advisory information as well as the U.S. Department of State Consular Information Sheet for the country in question. Both documents may be accessed on the web at <http://www.state.gov>
2. The student must consider carefully the risks described in the Travel Alerts/advisory information and, weighing those risks against the value of the educational opportunity to the student, make his or her own determination about whether to continue with (on)10.9 (t)-4.6 (i)6.2. (t)-4.6 2t fgen (i)6.2.dese activity. In balancing these factors, the student should (on)10.9 (t)-4.6 (i)6.2. (t)-4.6 2t fgen (i)6.2.dese the existing Travel Alert or advisory may b (i)6.2.hanged to a mor (i)6.2.gent typ (i)6.2. warning, triggering section II of this policy and possibly aff (i)6.2.cting 9 (t)-4.6 (i)6.2.tudent’s ability to rec (i)6.2.ive a refund already expended for the research or tudy activity. The student should (on)10. also take into consideration tiossibility that, if he or she encounters difficulties abroad, the University and even the U.S. Department of State may be unable to assist.
3. The student must sign a specific release, acknowledging the existence of the travel alert/advisory and his/her decision to continue with tiplanned activity despite that warning, and r (i)6.2fl (i)6.2.asing 9 (t) a student is under age 19, his/her parent or guardian must also sign this release. If a student is age 19 or older, his/her par (i)6.2.nt or guardian must sign ticum (i)6.2.nt m (i)67 (r)-3.9 ((i)67 (l)-4.6 (y)10.9

FOR FACULTY LED GROUP PROGRAMS and or STUDENT INDEPENDENT STUDY ABROAD:
In general when the U.S. Department of State issues a travel warning that specifically forbids, restricts, or otherwise urges U.S. citizens leave a certain country the following rules apply:

1. University study abroad programs in that country shall be suspended.
2. No student shall be allowed to travel to that country under University auspices.
3. No student shall be given University funding for any activity in that country.

participant with all the needed security assessment information, require written response to such and if deemed appropriate cancel or severely restrict the program activities. Students



source that is not subject to regulations. At that time, ORCA will attempt to obtain a license from the regulating agency for procurement of desired ~~(b)~~ (b)

MTA questionnaire (e., will the materials be going to outside of ~~US~~ and therefore possibly subject to federal export control regulations). Any questions will be directed to the ORCA to make proper determinations regarding export licensing/packaging, if applicable

- x IPM will review research agreements, ~~Non~~Disclosure Agreements (NDA), or Material Transfer

Process for Petitioning for Waiver of Publication Rights

APPENDIX F

The University of South Alabama's policy is not to accept any kind of publication restrictions when accepting research projects, and the University works diligently to negotiate such language out of research contracts. However, in the event that we are unable to negotiate out publication restrictions, and the college or department can make a compelling case for accepting such

[Insert Department Letterhead]

Date:

To: Lynne Chronister
Vice President for Research

From:

RE: Petition to Waive the Right to Publish Results of Research

Dear Ms. Chronister,

The Department of _____ wishes to enter into a [insert agreement type] with [Name of company or agency] entitled "_____" under the direction of [name of PI]. The deliverable under the agreement is _____. The agreement proposed by [name of company or agency] includes the following clause:

Section No. [Title of Clause with Restrictions]

"Insert clause here"

The Sponsored Projects Administration (SPA) has attempted to negotiate the clause out of the terms and conditions but the sponsor would not agree to alter or delete the clause.

Since this clause is inconsistent with the generally accepted University wording on publications, we would like to petition to waive the right to publish the results of the research should [name of company or agency] object to the publication.

Title of Contract:

Project Funding Amount:

Principal Investigator:

We acknowledge that we may be required to waive the rights to publish the results of this research. We agree that any work related to the research that ~~is~~ published is not available for the merit or promotion processes. We agree that students and others whose careers could be affected by the publication bar will not be involved in research under this agreement.

Type PI Name	Date	Department Head	Date
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Approved:

Dean	Date	Lynne Chronister	Date
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The Office of Research Compliance and Assurance will assist the Office of Grants and Contracts Accounting with determination of sanction levels whenever necessary. No financial activities will proceed until technical review is conducted to ensure compliance with federal export control laws.

7. Countries of Concern

<u>Comprehensive Sanctions</u>	<u>Regime Based</u>	<u>Limited</u>
Cuba	Balkans	Burma
Iran	Belarus	North Korea
Sudan	Libya	Ivory Coast (Cote d'Ivoire)
	Congo (Democratic Republic)	