

**UNIVERSITY OF HOUSTON SYSTEM
ADMINISTRATIVE MEMORANDUM****SECTION: General Administration****NUMBER: 01.D.17****AREA: Legal Affairs****SUBJECT: Export Controls**

1. PURPOSE

The purpose of this policy is to foster compliance with U.S. export controls, to heighten awareness and understanding of export control laws and regulations and their application in the university setting, and to set forth expectations regarding compliance. Failure to comply with export control laws and regulations may result in severe criminal and civil penalties for the individuals involved, as well as administrative sanctions for the university.

2. SCOPE AND APPLICABILITY

Export control laws, administered by several federal agencies, restrict certain types of information, technologies and commodities that can be transmitted overseas to entities and individuals, including U.S. citizens, or made available to foreign nationals on U.S. soil. These laws are designed to protect U.S. national security and economic interests, and further U.S. foreign policy goals and they govern the transmission of “controlled” information, technology and items.

3. POLICY

3.1. The University is committed to complying with applicable export control laws and regulations.

3.2. Before engaging in activities potentially subject to export control laws, members of the university community must recognize the potential implications of such activity and comply with any requirements and limitations. Export control laws and regulations restrict two principal areas of activity: (1) the shipment, transmission or transfer of certain items, software, technology and services from the U.S. to foreign countries; and (2) the disclosure of certain items, software, technology, information or materials to foreign nationals located in the U.S., known as a “deemed export”. In addition, economic sanctions laws and regulations restrict certain transactions subject to sanctions, such as providing good or services to sanctioned or embargoed countries or entities or individuals identified on any restricted parties screening lists.

3.3. It is the responsibility of faculty, staff and students to be aware of and comply with U.S. export control laws, as well as university policies and protocols, before engaging in any activities that may raise compliance issues under U.S. export control laws. Each university will designate an individual or office to provide guidance to faculty, staff and students in assessing the applicability of export control regulations; however, primary responsibility for compliance rests with the individual faculty, staff or student.

4. REVIEW AND RESPONSIBILITY

Responsible Parties: Assistant Vice President for Sponsored Research Administration
Vice Chancellor for Legal Affairs and General Counsel

Review: Every five years

5. APPROVAL

Approved: _____
Senior Vice Chancellor for Academic Affairs

Senior Vice Chancellor for Administration and Finance

Vice Chancellor for Research and Technology Transfer

Vice Chancellor for Legal Affairs and General Counsel

Chancellor

Date

6. REFERENCES

- [University of Houston Export Controls webpage](#)
- [University of Houston Clear Lake Export Controls webpage](#)
- [International Traffic in Arms Regulations \(ITAR\) 22 C.F.R. §§ 120-130](#)
- [Export Administration Regulations \(EAR\) 15 C.F.R. §§ 730-774](#)
- [Office of Foreign Assets Control \(OFAC\) 31 C.F.R. §§ 500-599](#)
- [Atomic Energy Act of 1954 42 U.S.C. Section 2011, et seq.](#)
- [Nuclear Regulatory Commission Regulations, 10 C.F.R. Part 110](#)

- [List of Specially Designated Nationals and Blocked Persons \(SDN List\)](#)
- [Restricted Parties Screening Lists](#)