I. **PURPOSE & INTENT**

The University of South Florida System (USF System) anticipates that research, instruction, and public service will be accomplished openly and without prohibitions on the publication and dissemination of the results of academic and research activities, as permitted by law. However, while university research normally can be conducted openly and without restrictions, it sometimes involves technology or produces results that are subject to U.S. export control Regulations. U.S. export control Regulations restrict certain types of information, technologies, and commodities, including the disclosure of controlled information to foreign persons on U.S. soil.

II. **STATEMENT OF POLICY**

The USF System is committed to the highest level of compliance with all applicable export control laws and Regulations including the Export Administrations Regulations, the International Traffic in Arms Regulations and applicable U.S. sanctions Regulations. No USF System employee may transfer technology or items without complying with these laws and USF System Policy.
A. Compliance Resources

To ensure compliance with these Regulations, the USF System has developed an Export Control Manual. The manual is available via the USF System website at: http://www.research.usf.edu/dric/export-controls/docs/usf-export-control-manual.pdf. The manual provides rules and guidance on the export and “deemed export” of technology, goods, software, information and source code. The manual also outlines the responsibilities of various offices within USF System and how they can assist personnel with compliance. To ensure faculty, staff, students and visitors are provided with the necessary support to remain informed and compliant, the USF System has established the Export Control Officer (ECO) position within Research Integrity & Compliance. The ECO can be reached at exportcontrol@usf.edu. Additionally, USF System personnel may find specific information provided by the Office of Export Controls at the following website: http://www.research.usf.edu/dric/export-controls/export-controls.asp.

B. Responsibility for Compliance

It is the responsibility of all USF System personnel, including faculty, staff, visiting scientists, postdoctoral fellows, students, and all other persons retained by or working at the University to comply with all applicable laws, Regulations and the University’s written instructions and procedures regarding compliance with export control laws and Regulations. Personnel with responsibility for export-controlled programs or whose duties involve working with foreign nationals are encouraged to attend Export Compliance training sessions.

C. Potential Penalties

Failure to comply with U.S. export laws and Regulations may result in civil and criminal penalties for the University and/or the individual responsible. Penalties are severe and can result in large monetary fines and even imprisonment. Loss of export privileges and
debarment from federal contracting can also occur. Civil penalties may apply even to accidental violations.

In addition to penalties imposed by federal law, the USF System will investigate violations fully when the action occurs within the duties and functions associated with USF System business, research or education. Individuals found to have knowingly violated export control laws and policies will be subject to disciplinary processes and procedures. Depending on the severity of the offense, failure to comply with Policies, laws and Regulations may result in university sanctions up to and including termination.

*Current Responsible Office: Research and Innovation*

*Refer to the appropriate Responsible Office website for a current name of the Vice President or other Responsible Officer.*