I. PURPOSE & INTENT

The University of South Florida System (USF System) is committed to compliance with all applicable federal and state government laws regarding export controls (Please see USF System Policy 0-316 Export Control Compliance) and consistent with that commitment, this Policy is adopted.

II. STATEMENT OF POLICY

The following Policy outlines the steps necessary to achieve USF System compliance with U.S. Export Control Laws and Regulations, including U.S. economic sanctions and embargos, as they relate to certain distance learning activities.

III. APPLICABILITY & AUTHORITY

All USF System personnel, faculty, and students are responsible for complying with applicable laws, regulations and the University’s written instructions and procedures regarding compliance with Export Control Laws and Regulations. Any person aware of any export of University goods, technology or services to Cuba, Iran, N. Korea, or Syria, (or any other country on the United States’ Embargoed Countries’ list http://www.research.usf.edu/dric/export-controls/countries-of-concern.asp) is required to contact the University’s Export Control Officer at exportcontrol@usf.edu in advance of the transmittal of goods, technology or services.

IV. DEFINITION OF TERMS

A. Distance Learning Support Services: Distance Learning Support Services includes, but is not limited to, telecommunications-assisted learning, online course participation, correspondence education, financial aid, associated electronic resources and off-site learning.
B. Embargoed Countries: Certain countries are subject to a comprehensive or near comprehensive program of embargoes and trade sanctions by the federal government, including: Cuba, Iran, N. Korea, and Syria. For a list of Embargoed Countries, please refer to http://www.research.usf.edu/dric/export-controls/countries-of-concern.asp.

C. Export Control Laws and Regulations: Federal and state laws and regulations prohibit the export of certain goods, technology, and services (including Distance Learning Support Services) to Embargoed Countries.

V. PROCESS STEPS

A. Responsible Offices: The Office of the Registrar, Information Technology (IT) and the Office of Admissions (Undergraduate Admissions & Graduate Admissions) will develop process steps to ensure compliance.

B. Examples of Permissible & Impermissible Distance Learning Support Services:

1. Permitted:
   
   • Posting course information on a public website for which no login or password is required is acceptable.
   
   • Distance instruction to individuals from Cuba, Iran, N. Korea, and Syria who are physically located in the United States at the time the distance learning services are provided.

2. Not Permitted:

   • Distance Learning Support Services may not be provided for individuals physically located in Cuba, Iran, N. Korea, or Syria (or other Embargoed Countries), regardless of nationality of the individual, without written authorization from the federal government.
   
   • USF System instructors may not respond to specific questions asked by a student physically located in a sanctioned country.

*Current Responsible Office: Academic Affairs

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

History: New 7-9-14, Amended 1-24-18 (technical), Amended 3-7-18 (technical).