I. INTRODUCTION (Purpose and 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 research in a university setting generally is and normally can be conducted openly and without restrictions, academic inquiry may require the use of certain technology that is controlled by or produces results which are subject to federal U.S. export control regulations. Export control regulations restrict certain types of information, technologies, and commodities that can be transmitted overseas to individuals, including U.S. citizens, or made available to foreign nationals on U.S. soil. Penalties for non-compliance with export control laws are often severe and may impact both the institution and the researcher.

The USF System is committed to the highest level of compliance with all applicable export control laws and regulations. The Export Administration Regulations, under the jurisdiction of the Bureau of Industry & Security, Department of Commerce, International Traffic in Arms Regulations administered by the Directorate of Defense Trade Controls, Department of State, and the embargoes and trade sanctions administered and enforced by the Office of Foreign Assets Control, Department of the Treasury, are the main U.S. export control regulations that apply to certain USF System research and training activities.

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 with 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:
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 exportcontrols@usf.edu. Additionally, USF System personnel may find
specific information provided by the Office of Export Controls at the following website:

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.

It is the responsibility of all USF System personnel, including faculty, visiting scientists, postdoctoral fellows, students, administrators, staff, volunteers, and all other persons retained by or working at the University, to be aware of and comply with the laws and the University’s written instructions and procedures regarding compliance with export control regulations. Specific information is provided by the Office of Research & Innovation, Division of Sponsored Research, Office of Export Controls at the following website: http://www.research.usf.edu/dsr/export-controls/export-controls.asp.

Authorized and signed by:

Paul R. Sanberg, Ph.D., D.Sc., Sr. Vice President for Research & Innovation
Judy Genshaft, President