



Export Control Compliance Information Sheet

EXPORT COMPLIANCE STARTS WITH YOU

When could export controls be applicable to you?

Export controls could apply when you are involved in activities such as:

- International collaborations and foreign partnerships - Hosting international visitors, i.e., visiting scholars
- Foreign travel
- Conducting research involving biologic or select agents
- Working with students, staff, or collaborators located outside the United States
- Teaching, presenting, or performing outside of the U.S. – virtual or in person in sanctioned countries
- Taking/shipping export controlled items out of the U.S.
- Purchasing or receiving items from foreign entities
- Purchasing International Traffic in Arms Regulations-regulated items
- Performing research intended for military use - Providing a defense service
- Performing dual-use research (research that may have both commercial purposes and military applications)
- Activities involving CUI or research security requirements

What is an “Export”?

- Physical Export: sending any material to foreign locations (including hand-carry & electronic exports)
- Deemed Export: disclosing controlled technology and/or technical data, whether written, oral, or visual, to a foreign person in the United States (may also include access or visual inspection of ITAR equipment).

Who is a “foreign” person/national?

A foreign person is generally an individual who is not a U.S. citizen, lawful permanent resident (green card holder), or protected individual under U.S. immigration law. Foreign persons may also include foreign organizations, companies, governments, or other entities.

Why do you and the university need to comply with export controls?

The U.S. government mandates compliance through a complex set of laws and regulations that restrict the export (physical or deemed) of export controlled items and limit access of some foreign persons to certain biologic agents, technology, technical data, software or services without first obtaining a license or determining if an exception may apply. Regulations, including:

- Export Administration Regulations (EAR)
- International Traffic in Arms Regulations (ITAR)
- Office of Foreign Asset Control (OFAC)

In addition to these regulations:

- Export controls apply regardless of whether the activity is funded or unfunded
- You are responsible for any item in question
- Universities are expected to develop processes to comply
- **Price of non-compliance – penalties, fines & possible incarceration**

Are there exceptions?

There are two general (2) exceptions to export controls the university has available:

1. Educational: courses published in a course catalog, available to all students and do not include ITAR items
2. **Fundamental research:** **May be impacted by these restrictions, but not limited to:**
 - Limitation on participation by foreign nationals, which may include International collaborators, students, or faculty
 - Publication restrictions, etc.
 - Non-disclosure/proprietary agreement
 - Personnel restrictions, etc.
 - End use prohibitions

This information is intended to provide a high-level overview of export controls. This document should not be considered an all-inclusive description of export controls. Export control regulations change frequently and are complex. Contact ORI with questions. Version 9/16/2026

What do I do if I have questions?

Contact ORI for an export control risk assessment. ORI performs risk assessments for grants/contracts processed through ORI and other individual requests. Assessment includes, but is not limited to:

- Determining if the educational or fundamental research exception is applicable
- Reviewing the material/technology EAR or ITAR classifications
- Country interaction: sanctions vary by country and change often. Currently heavily sanctioned countries include, but are not limited to, Cuba, Iran, North Korea, and Sudan.
- Individual screenings to ensure persons/entities have not been identified as a restricted party

If it is determined the project and/or person(s) is/are restricted:

- Technology Control Plans (TCP) may be required and
- Export Licensing may be required

Spectrum of Research & Export Controls



Fundamental	Dual Use (EAR)	Military (ITAR)	OFAC
Research Typically, not subject to regulations open participation. Excluding research involving ITAR controlled equipment	Restricted Research Participation of foreign persons may require a license or exception	Restricted Research Participation of foreign persons most likely will require a license or exception	Restricted Research OFAC issues may arise when collaborating with sanctioned countries, restricted parties, blocked entities, or prohibited end users.

Office of Research Integrity is here to help

In addition to performing export control analyses, ORI provides:

- UCCS Export Control website: <https://osp.uccs.edu/export-controls>
- Training online and in person
- Restricted party screening (visitors, researchers, collaborators)
- International collaboration reviews
- Licensing to allow foreign nationals access or to ship out of the U.S. (if possible)
 - Only OSPRI can apply for an export control license on behalf of UCCS
- Contract negotiation to allow for open access, i.e., no publication or personnel restrictions
- Assistance with controlled unclassified information (CUI) and research security compliance requirements

Many departments are ORI's export control partners

- Faculty, Researchers & Staff
- Purchasing
- [Mail and Shipping Services](#)
- [Emergency and Safety Services](#)
- [Facilities Services Department](#)
- Human Resources
- Technology Transfer
- [International Student and Scholar Services](#)
- [IT Security](#)

Questions? Contact:

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