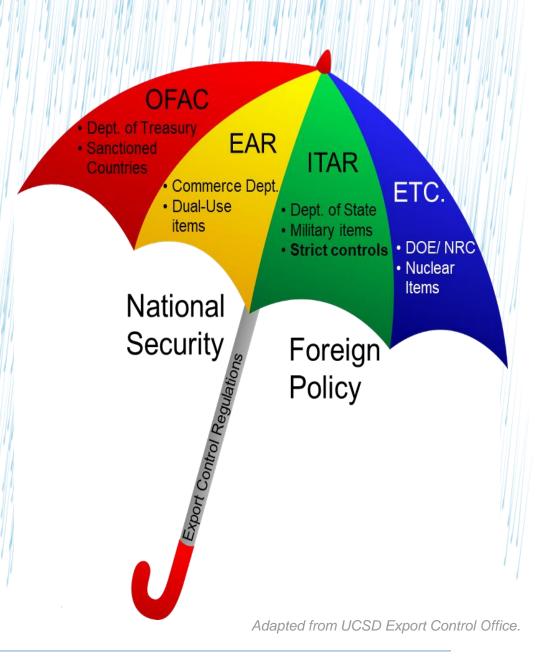
Export Controls

Federal laws and regulations that control:

- The export of sensitive equipment, software, and technology
- Trade and financial transactions

Promote **national security interests** and **foreign policy objectives**.



OFAC Sanctions



Administered by the U.S. Department of Treasury, Office of Foreign Assets Control (OFAC), and impact our university activities.

The most restrictive sanctions programs (Cuba, Iran, North Korea, Syria and the Crimean region of Ukraine) prohibit:

- A broad range of services and transactions that benefit or provide value.
- Export of products, software, and transfer of technology.
- Providing educational services and technical services, even where no monetary compensation occurs.

Online courses, employment, contract work, imports and exports will likely require a license from OFAC.

Coordination with Export Control Officer (ECO)

The following offices should coordinate with their local export control offices and if needed, general counsel, to identify students who may wish to take online classes from and individuals who may wish to conduct research or telework in or with sanctioned countries:

- International Students and Scholars Directors
- Registrar
- Graduate and Undergraduate Division Deans
- Faculty
- Extension

OFAC and Export Licensing

- Historically OFAC takes 3-12 months or longer for license processing. Timing is impacted by OFAC operations and volume of licensing.
- License applications may be declined, even after waiting 12 months.
- Licensing from other agencies may be required before initiating a transaction.

Other Export Control Considerations for Remote Work

- Exports of items (such as laptops or research equipment) or software to support work/research/courses overseas
- Defense services or research with potential military end-use or research or services that include a defense article or foreign military
- Exports of information, including remote access to information that is not publicly available or publishable
- Restricted party screening

Contact

Location Export Control Officers:

https://www.ucop.edu/ethics-compliance-audit-services/compliance/exportcontrol/campus-contacts.html

Marci Copeland **Associate Director Export Control** UCOP Ethics, Compliance and Audit Services marci.copeland@ucop.edu 510-987-9580

Ellen Auriti **Principal Counsel UCOP Office of the General Counsel** ellen.auriti@ucop.edu 510-987-9429