



UWM EXPORT CONTROLS IN RESEARCH POLICY

No: 14-03

Date: _____

Authority: -International Traffic in Arms Regulations
(ITAR, 22 CFR 120-130) Department of State
-Export Administration Regulations (EAR, 15
CFR 730-774) Department of Commerce
-Foreign Asset Control Regulations (FACR)
Office of Foreign Asset Controls
(OFAC)/Department of Treasury

Initiator: Vice Provost for Research, Office of Research

Responsible Party: Vice Provost for Research, Office of Research

I. Purpose

In the interest of national security, the U.S. government has enacted numerous laws and regulations which operate to restrict the use of, and access to controlled information, goods, and technology by persons and entities outside the U.S. and certain foreign persons inside the U.S. These laws and regulations are collectively referred to as “export control regulations.”

II. Policy

Openness in research and free dissemination of research results are core values at UWM, as institutionalized in its Openness in Research Policy. As an Institution of Higher Education advancing fundamental research, most UWM research is excluded from export control regulations. However, where export controls are applicable to UWM’s research activities, UWM is committed to fully complying with all applicable export control regulations.

UWM employees and students, and other persons involved in research on campus are obligated to comply with all applicable export control regulations and to work cooperatively with those responsible for UWM’s export control compliance.

Violation of export control regulations can lead to severe criminal and/or civil sanctions for the individual who violates the law and/or UWM.

III. Procedures

In order to conduct export-controlled research, the principal investigator (PI) must be granted an exception to UWM’s Openness in Research Policy (see SAAP 15-XX) and complete the Export Control Screening Form (Attachment A).


IV. Resources

Additional background and information about supporting processes can be found in the [Guidelines for Export Controls in Research](#) [future Link].

V. Contact Information

Office of Research

Attachment A Export Control Screening Form

	UNIVERSITY OF WISCONSIN – MILWAUKEE EXPORT CONTROL SCREENING FORM	
<p>The following screening questions are to be used to determine if a particular project is affected by U.S. export control regulations. The purpose of these questions is to determine if <i>foreign persons may have access to project technology or information that is controlled under the U.S. export control regulations.</i></p>		
PROJECT IDENTIFICATION		
MIL #: _____	Project Title: _____	PI / PM: _____
EXPORT CONTROL ASSESSMENT		
Answer the following questions for scientific, engineering or technology projects		
QUESTION	RESPONSE¹	
1) Controlled Technology <i>Check "Yes" in the box to the right if any of the following apply to this award:</i> <ol style="list-style-type: none"> a. The project is sponsored by the U.S. Department of Defense (DOD) or a defense contractor AND has a potential military application, or b. The project includes hardware, software, substances, information or data controlled under the International Traffic in Arms Regulations (ITAR) or Export Administration Regulations (EAR), or c. The project uses or creates items, information or data of a <u>technical nature</u> that will NOT be made publicly available (such as subject to a publication restriction or non-disclosure agreement). 	<input type="checkbox"/> Yes <input type="checkbox"/> No	
2) Export / Deemed Export <i>Check "Yes" in the box to the right if any of the following apply to this award:</i> <ol style="list-style-type: none"> a. Foreign persons will participate in this project as sponsors, collaborators or staff, or b. Hardware, software, substances, information or data for this project will be exported out of the U.S. or transferred to foreign persons within the U.S. 	<input type="checkbox"/> Yes <input type="checkbox"/> No	
For HELP see: http://www.grad.wisc.edu/research/policyrpe/wisperhelpscreen.pdf		
RESULTS		
<input type="checkbox"/> No License Required – One or both questions answered No <input type="checkbox"/> Complete Full Assessment – Both questions answered Yes (contact your departmental Point of Contact)		
Additional Comments:	_____	

Note 1: Reassessments – Projects should be reassessed if (1) the nature or scope of the project changes; (2) new foreign staff is assigned to the project; or (3) a new export/change in destination is planned.

Authorization:

Prepared By (PI or delegate): _____	Date: _____
Reviewed By (Office of Research): _____	Date: _____