Instance Requiring Export Control Screening / Review	Purpose of Review	Process for Notification	Information Required	Items Screened	Resolution Process / Result
Foreign Visiting Scholars					
Formally requested and in process by OIE	Conduct RPS of the individual and evaluate for potential <u>deemed</u> <u>export</u> license requirements.	OIE refers the file of prospective visiting scholars in STEM fields to Research Security.	DS-2019 packet (if applicable), resume (required), and completed Visiting Scholar Agreement (if applicable) – OIE and Research Security will determine which items are required and may request additional information to perform the appropriate screening.	The individual, supervisor (employment or academic), spouse and dependents (if traveling with visitor), associated universities, and employers. May also screen research collaborators and their respective institutions if information is available.	If any parties appear on any government restricted/denied entities lists these concerns will be discussed with the EO and sponsor/host for final determination. Approval, or any remaining concerns/red flags will be communicated by Research Security to OIE and the sponsoring host.
Under consideration by sponsor/lab, prior to submission to OIE	Conduct RPS to identify any potential concerns/issues prior to initiating the formal process of vetting and acceptance by OIE.	The sponsoring faculty/staff member may request Research Security to screen prospective visiting scholars prior to formally submitting to OIE (for example, during initial communication with scholar while considering addition to lab). This provides an opportunity to identify any potential issues.	Name, affiliated organization, and resumé if available.	The individual and any other known associates as described above.	If any parties appear on any government restricted/denied entities lists these concerns will be discussed with the EO and sponsor/host for consideration.

Instance Requiring Export Control Screening / Review	Purpose of Review	Process for Notification	Information Required	Items Screened	Resolution Process / Result
Foreign Collaborations					
Foreign collaborations indicated in a UTA BlueSheet in Mentis for sponsored projects	Conduct RPS of the collaborator(s) and their affiliated entities to identify any red flags and evaluate for potential export license requirements.	When "Foreign Involvement" is selected on the BlueSheet, ORS and Research Security receive an automatic notification for review.	List of any foreign collaborators and institutions, international travel plans related to the project, export-controlled items and/or technology involved, and details to determine if the project qualifies as "Fundamental Research."	Collaborating individuals and known affiliated institutions.	If any parties appear on any government restricted/denied entities lists these concerns will be discussed with the EO and PI for final determination. Research security requirements will be shared with PI.
Unsponsored projects involving foreign collaborations, or any foreign collaborations under early consideration	Same as above.	The PI should contact Research Security to request screening of potential collaborators.	Same as above.	Same as above.	Same as above.

Instance Requiring Export Control Screening / Review	Purpose of Review	Process for Notification	Information Required	Items Screened	Resolution Process / Result
Foreign Travel					
Travel for Official University Business (Regardless of Funding Source)	Determine if a license or license exception is required for the planned destination, purpose of the travel, or equipment taken during the trip. Also conduct RPS of the individuals/entities at the destination to identify any red flags and evaluate for potential export license requirements.	All in-state, out-of-state, and outside contiguous US travel for employees, students, and non- employees who are traveling for official University business must receive approval through the Travel Authorization (TA) process. ORS and Research Security receive a notification of TAs with foreign travel destinations.	Countries the individual will travel to, individuals the traveler will meet with, institutions and companies the traveler will visit, any equipment (including laptops and phones) the traveler plans to take with them.	When the destination is a CoC, Research Security will screen individuals and entities the traveler will visit or work with at destination. Destinations other than CoC will be screened at the discretion of Research Security.	Any risk or license requirements associated with the destination countries, screening results/concerns (as noted above), and any concerns regarding equipment taken abroad will be shared with the traveler and Travel Office.
Personal Travel	All travel for the purposes of University business must complete the TA process, see above. Personal travel is not evaluated by the University.	N/A	N/A	N/A	N/A

Instance Requiring Export Control Screening / Review	Purpose of Review	Process for Notification	Information Required	Items Screened	Resolution Process / Result
International Shipments					
Processed via eShipGlobal	Determine if the item or destination requires an export control license, license exception, or <u>AES</u> <u>filing</u> .	eShipGlobal will flag any export control concerns for international shipments and ORS will automatically be notified for review.	eShipGlobal will automatically screen the recipient and contact. ORS may request additional information to make an export control determination, such as the purpose of shipment, value, or country of origin.	Recipient (individual and/or institution).	Once all details have been confirmed and overall export compliance has been verified, ORS will reply to the shipper with approval, record retention requirements, and any other necessary instructions.
Processed by any means other than eShipGlobal	Same as above.	All personnel coordinating an international shipment by any means other than eShipGlobal are responsible for contacting ORS prior to shipping for export review and approval.	The recipient (individual and/or institution). ORS may request additional information as described above to complete the review.	Same as above.	Same as above.

Instance Requiring Export Control Screening / Review	Purpose of Review	Process for Notification	Information Required	Items Screened	Resolution Process / Result
Vendor Approval					
Vendors/Purchases set up through Procurement	Conduct RPS of vendor to identify any red flags.	For vendors that are set up through Procurement, Research Security will be notified for review.	Vendor company name and contact, any "dba" or "aka" names, address.	Vendor and contact person.	Research Security will notify Procurement of approval or any concerns.
Vendors/Purchases made that do not go through Procurement	Same as above.	The purchaser should contact Research Security to request screening of potential vendors.	Same as above.	Same as above.	Research Security will notify the purchaser of approval or any concerns.
Research Related Agreements (MTA, MOU, NDA, etc.) Involving Foreign Parties	Conduct RPS of the individuals and entities involved in the <u>research</u> <u>related agreements</u> to identify any red flags and evaluate for potential export license requirements.	For agreements involving foreign parties not already identified as having "Foreign Involvement" via a BlueSheet, Agreements Manager will notify ORS and Research Security for review.	Foreign parties involved (both individuals and institutions/companies), institutional address.	Individuals and/or entities involved.	ORS and/or Research Security will notify the Agreements Manager of approval or any concerns.

Instance Requiring Export Control Screening / Review	Purpose of Review	Process for Notification	Information Required	Items Screened	Resolution Process / Result
Gifts					
Research Gifts Processed Through Office of Grant and Contract Services	Conduct RPS of the donor (individuals and/or entities) to identify any red flags and evaluate for potential export license requirements.	When "Foreign Involvement" is selected on the BlueSheet, ORS and Research Security receive an automatic notification for review.	Donor name and address, contact person, gift agreement.	Donor (individual and/or entity).	ORS and/or Research Security will notify the PI and OGCS of any concerns.
Non-Research Gifts Processed Through Development	Same as above.	The Development Office notifies Research Security of gifts from entities or individuals from a CoC.	Donor name and address, contact person, gift agreement if applicable.	Same as above.	Research Security will notify Development of any concerns.

\*Note: ORS and Research Security may receive screening requests from within Research Administration or other departments at UTA (such as HR, Legal, Provost Office) when potential export control or foreign influence cases are identified. Findings and determinations will be communicated back to the requesting department and/or relevant UTA personnel as needed.

#### **Acronyms and Definitions:**

**OIE** – Office of International Education

ORS – Office of Regulatory Services, contact at regulatoryservices@uta.edu

Research Security - contact the Research Security Manager, Garrett Werner, garrett.werner@uta.edu

**EO** – Empowered Official – person with oversight of the export control program with University's authorization to sign license applications; the designated EO at UTA is the Vice President for Research Administration

**RPS** – Restricted Party Screening – screening an individual or entity against federal lists of restricted individuals/parties, i.e., Specially Designated National and Blocked Person List (SDN), Denied Person List, Entity List, Unverified List and Debarred Party list. The RPS process ensures that UTA can safely and legally engage with the individual/entity and helps to identify any potential red flags or risks.

**CoC** – "Countries of Concern," i.e., Afghanistan, Belarus, Burma, Central African Republic, China, Crimea Region of Ukraine (Ukraine), Cuba, Cyprus, Democratic Republic of the Congo, Eritrea, Haiti, Iran, Iraq, Lebanon, Libya, North Korea, Russia, Somalia, Sudan, Syria, Venezuela, Zimbabwe

**STEM** - science, technology, engineering, and mathematics

DS-2019 – process in OIE for requesting/sponsoring J Exchange Visitors

BlueSheet – UTA's internal electronic routing form in Mentis for grant proposals and sponsored research projects

**Fundamental Research** - research in science, engineering, or mathematics, the results of which ordinarily are published and shared broadly within the research community, and for which the researchers have not accepted restrictions for proprietary or national security reasons; not subject to export control restrictions **eShipGlobal** – UTA's <u>preferred shipping vendor</u>

**Visual Compliance (VS)** – UTA's software tool for performing RPS; VS is integrated with federal lists and performs dynamic, continuous screening to automatically alert ORS when a previously screened individual/entity has been added to a federal list