To: All Faculty, Staff, and Administrators

From: Dr. William M. Pierce, Executive Vice President for Research & Innovation

Date: 6/25/2013

Re: Export Controls and Trade Sanctions

The U.S. government regulates the distribution of strategically important products, services, technology, and information to foreign nationals and foreign countries. These regulations prohibit the unlicensed transfer of certain commodities or information to certain countries and normally arise when the nature of an item has actual or potential military application. The government also has regulations restricting any transaction with certain sanctioned countries, organizations, and individuals. These regulations, including the International Traffic in Arms Regulations (ITAR), Export Administration Regulations (EAR), and Foreign Assets Control Regulations (FACR), are collectively referred to as export control laws.

The University of Louisville fully supports compliance with United States export and sanction laws. We are also committed to preservation of academic freedom. Fortunately most, but not all, research activities on campus will fall under the "fundamental research exemption," which provides that basic and applied research activities, not subject to publication or access restriction, will not be subject to export controls.

While most research and international interactions conducted at UofL will fall within one or more of several exemptions and exclusions from licensing requirements, it is important to understand your responsibility under the law. One important note for faculty and staff is the fact that the export control regulations define "export" to include not only the transfer of tangible or physical items, such as biological materials, but also intangible information which may include research data or engineering designs. Additionally, an export is defined not only as an actual physical shipment out of the U.S., but can also include the release of controlled technical data to foreign nationals on U.S. soil.

The Office of Export and Secure Research Compliance has been established to assist you in understanding and meeting your legal duty. Please see the Office of Export and Secure Research Compliance website for additional information including analytical tools and points of contract for assistance in understanding the requirements.

William M. Pierce Jr., Ph.D.
Executive Vice President for Research and Innovation
Professor of Pharmacology and Toxicology

Jouett Hall, Room 202 • University of Louisville • Louisville, KY 40292
P: 502.852.8373  F: 502.852.8375  E: pierce@louisville.edu  W: louisville.edu