

University of Rochester commitment to complying with U.S. export control laws

The University of Rochester is committed to complying with U.S. export control laws, including the International Traffic in Arms Regulations ([ITAR](#)) administered by the Department of State, the Export Administration Regulations ([EAR](#)) administered by the Department of Commerce, and the specific economic and trade sanctions administered by the U.S. Department of the Treasury, Office of Foreign Assets Control ([OFAC](#)).

It is important that the University community be familiar with U.S. export control laws in order to ensure compliance. University faculty, staff and students are expected to identify potential export related concerns. These could include sending/carrying an export controlled item out of the U.S.; sponsor mandated publication approval requirements or restrictions on project personnel participation or receipt of export controlled information or an ITAR controlled item. University personnel should notify [export@rochester.edu](mailto:export@rochester.edu) or the [Office of Research and Project Administration](#) in advance of any research proposal submission that may have export related concerns or potential exports (including deemed exports).

An overview of U.S. export control laws for the University of Rochester community is available online: <https://www.rochester.edu/orpa/compliance/#export>

Teaching and information resulting from research at the University of Rochester are largely not subject to U.S. export control laws because they result from fundamental research, are published and/or constitute information concerning general scientific, mathematical, or engineering principles commonly taught at a university. That said, the University may need to apply for and receive an export license if sending an export controlled item out of the U.S. Careful consideration must also be given to the end use and/or end user of an item exported from the U.S. (e.g. military end uses/users; restricted parties). Also, situations may exist in which the University may need to apply for and receive a deemed export license and/or implement a technology control plan if receiving or developing export controlled information (e.g. under a confidentiality agreement), or working with an ITAR controlled item. Such a technology control plan must be reviewed by the Committee on Science and Security and will include:

- University commitment to export compliance
- Description of the export controlled item
- Project personnel (and restricted party screening)
- Physical security controls
- IT security controls
- Self-evaluation
- Training

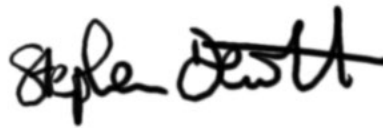
Certain projects that are approved by the President of the University as an exception to the [University's policy on OPEN RESEARCH AND FREE DISSEMINATION OF IDEAS AND INFORMATION](#) may be subject to export control laws and require access restrictions for personnel to work on the project. Any export controlled projects must be clearly defined, reviewed by the Committee on Science and Security, and a corresponding technology control plan shall be implemented.

It is the University's intention that all University transactions and activities be in compliance with U.S. export control laws. Violations of U.S export control laws may be subject to both criminal and significant administrative penalties, and violators may also lose their export privileges.

The University of Rochester is committed to helping faculty, staff and students understand U.S. export control laws and ensure the University's compliance.

Any questions regarding U.S. export compliance, including requests for export compliance training, updates to the University's export compliance efforts, the need for an export or OFAC license, the legitimacy of a transaction and/or potential violations shall be directed to: Josef Mejido, Export Control Officer [export@rochester.edu](mailto:export@rochester.edu).

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Dewhurst". The signature is fluid and cursive, with the first name "Stephen" written in a larger, more prominent script than the last name "Dewhurst".

Stephen Dewhurst  
Interim Senior Vice President for Research  
Vice Dean for Research, School of Medicine & Dentistry  
University of Rochester