University of Houston Z Clear Lake

Export Controls Procedures

In FY21, the University of Houston System (UHS) audited Export Controls procedures at its four institutions to determine whether university procedures align with federal export controls regulations. The audit team recommended that UHCL communicate export controls procedures and expectations to all faculty, staff, and administrators. The Office of Sponsored Programs (OSP) has primary responsibility for monitoring these procedures, in collaboration with colleagues from other UHCL offices.

International Travel

- Approval for international travel requires completion of <u>CITI training on Export Controls</u> within three years of the date of departure.
- Staff who prepare or process Travel Expense Reports must complete CITI training on Export Controls every three years.
- Submit to <u>sponsoredprograms@uhcl.edu</u> the following as email attachments in one (1) email:
 - Unexpired CITI certificate showing completion of Export Compliance training
 - Agenda, itinerary or other supporting document about the purpose and destination,
 - including any stops or layovers in countries other than the destination
 - Completed UHCL Export Controls and Travel Embargo Form
 - If you plan to travel with a personal or UHCL laptop, please answer YES to question b on the Export Controls form so that arrangements can be made for a "clean" laptop.
- The signed Export Controls and Travel Embargo Form and unexpired Export Compliance CITI certificate are required for your Concur Travel Request. See the <u>UHCL Travel website</u> for more information.
- Foreign travel attachments must be approved by signature of the Provost via the Concur workflow

International Shipping

- Staff who prepare or process Postal Expenditures Forms for international shipping must complete CITI training on Export Controls every three years.
- All Postal Expenditures Forms for international shipments must be signed by the OSP Executive Director, even when charging the expense to state or institutional cost centers.
- The CITI training certificate for the Department Contact named on the Postal Expenditures Form should be attached when the form is sent to <u>sponsoredprograms@uhcl.edu</u> for approval.

International Visitors

- Faculty and staff who host international visitors should complete CITI training on Export Controls every three years.
- Hosts should determine the citizenship status of all international visitors to determine if they fit the Export Controls definition of "foreign person" (anyone not a U.S. citizen or permanent resident).
- The host should notify University Police for assistance in escorting an international visitor and/or providing access to restricted spaces on campus.
- NOTE: UHCL faculty, staff and students on F-1, J-1, or H-1B visas are not considered "foreign persons" for the purposes of escort or access.

International Research Collaborations

- Faculty and staff who conduct research with international collaborators should complete CITI training on Export Controls every three years. An international collaborator is anyone who is not a U.S. citizen or permanent resident. The collaborator may be located in the U.S. or in another country. UHCL faculty, staff and students on F-1, J-1, or H-1B visas are not considered "foreign persons" for the purposes of research collaboration.
- Faculty and staff who conduct research with international collaborators should complete the International Collaborator section of the UHCL COI-International Collaboration form annually and submit it to the Office of Sponsored Programs.

For assistance on any of these matters, contact the Office of Sponsored Programs at 281-283-3015 or <u>sponsoredprograms@uhcl.edu</u>.