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 CITI training on Export Controls within three years of the date of departure.
- Staff who prepare or process Travel Authorizations (TAs) and/or Travel Expense Reports must complete CITI training on Export Controls every three years.
- Foreign travel must be approved on the Travel Authorization (TA) form, by signature of the President, Provost, or VP in traveler’s division, with all required attachments.
  1. Complete the TA with all signatures except the provost or president.
  2. Attach (a) the completed UHCL Export Controls and Travel Embargo Form; (b) the CITI certificate showing completion of Export Controls training, and (c) the agenda, itinerary or other supporting document about the purpose and destination, including any stops or layovers in countries other than the destination.
  3. 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.
  4. Send the entire packet to sponsoredprograms@uhcl.edu for review and approval prior to departure. OSP will forward the packet to the provost for foreign travel approval on the TA. The provost’s office will return the packet to the traveler and the traveler’s CBA/DBA.
- If a Travel Expense Report for international travel is submitted without a complete TA form, it will be held by AP until a complete TA is submitted, containing the appropriate signatures and attachments.

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 sponsoredprograms@uhcl.edu 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 OSP at x3015 or sponsoredprograms@uhcl.edu.