



OFFICE OF THE VICE PRESIDENT FOR
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TO: Members of the University of Iowa Research Community

FROM: Daniel Reed 
Vice President for Research and Economic Development

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Subject: Export Controls

The University of Iowa has a long-standing commitment to advance education and research by promoting and protecting academic freedom and disseminating information in an open and freely accessible manner. This openness includes encouraging participation of students, faculty, and others in research and educational activities without regard to their nationality.

In the interest of protecting the national security and the domestic economy, the US government has promulgated regulations that have serious implications related to research associated with security concerns and foreign policy matters. These three principal sets of export regulations are (1) the International Traffic in Arms Regulations (ITAR) implemented by the Department of State; (2), the Export Administration Regulations (EAR) implemented by the Department of Commerce, and (3) sanctions programs administered by the Office of Foreign Assets Controls (OFAC) unit of the Department of the Treasury.

These regulations impose controls over the provision of certain services and access to, or transfers of, physical items, computer software and technical information, as well as restrictions arising from economic and trade sanctions. The regulations also control the transfer of technical information to foreign nationals, even when those transfers take place in the United States (known as a “deemed export”). Following the tragic events of 9/11 these regulations have been given heightened scrutiny, including in the area of academic research.

Although most research conducted at UI and on most U.S. college and university campuses is fundamental research and thus exempt from the export control regulations, *there are important exceptions*. Faculty and staff need to be aware that university research involving technologies controlled under the EAR or ITAR, or transactions and exchanges with designated countries, individuals, or entities, may require the University to obtain prior approval from the appropriate agency before allowing foreign nationals to participate in the controlled research or collaborations with a foreign company and/or sharing research data, materials, or equipment with persons who are not United States citizens or permanent residents. *The consequences of violating these regulations can be very significant, and include the loss of research funding and/or federal contracting*

privileges, significant civil fines (for individuals and institutions), and criminal sanctions, including imprisonment.

The University is dedicated to the principles of academic freedom and will take all appropriate measures to ensure that its research and scholarly activities remain freely accessible and unrestricted. However, when it is determined that export control regulations apply to specific projects, the University is committed to full compliance with the regulations and expects all University investigators to be aware of and comply with applicable export control requirements.

Because the federal regulations are complex and each case presents unique issues, we are prepared to assist the University community in understanding and complying with all relevant laws, regulations, and policies and urge faculty to access the informational tools provided on this web site. Faculty should also freely contact the University's Export Control Coordinator in the Division of Sponsored Programs (335-3582) for assistance in interpretation, clarification and understanding compliance requirements.