# **Using Export Compliance Toggles in RAMESeS**



**RAMSeS** has three toggles which flag a project for review and management by the Export Compliance Office. If you find any of the listed concerns in your project, please select the appropriate toggle and provide a one to two sentence summary of the concern.

**IMPORTANT:** When editing your email to Export Compliance, you may flag your notice as "URGENT" when the award or agreement requires a turnaround time that is 48 hours or less. Please use the following titles in the subject line in these cases:

For **24hr turnaround**, use:

"URGENT-24"

For **48hr turnaround**, use:

"URGENT-48"

# **Direct projects to the Export Compliance Office for:**

### **Publication Restrictions Toggle**

**Confidentiality & Publication Language:** The <u>University Policy on Export Controls</u> allows up to a year delay (360 days) for publications that may contain patentable, confidential, or proprietary information.

## **Personnel Restrictions Toggle**

**Personnel Restrictions:** If a project restricts participation or access by non-U.S. person or involves any technology/ information that is restricted from access by non-U.S. persons.

### **Notes:**

- Non-U.S. Persons include individuals who do not hold U.S. Citizenship, Permanent Residency, or Asylum Status.
- FAR and DFAR Clauses may entail either publication or personnel restrictions. Reference the Export Compliance Government Clauses Guidance Chart for more information.

## **Other Concerns Toggle**

**Antiboycott Regulations:** The University cannot agree to any request or requirement to furnish written or oral information about business activity, or restrict the University from engaging, with another country. This includes information such as emails, contracts, purchase orders, letters of credit, import documents, invoices, and shipping terms pertaining to business in another country.

**Controlled Technology:** Sometimes government or private sponsors will provide controlled technologies (including materials), information, or software, to University Pls to conduct their scope of work on a given research project. These projects are flagged for export controls because the items or information may require authorization to be accessed by individuals who are not a U.S. citizen, permanent resident, or asylee/refugee.

**International Transfers or Transactions:** When research involves the international transfer of technology, software, or information, an export license may be required, regardless of what country or individual the items are being transferred to. Additionally, certain financial transactions may be subject to U.S. sanctions if they involve comprehensively sanctioned countries or specially sanctioned entities or individuals.

**Visual Compliance Alerts:** Please note, always use Visual Compliance to screen international collaborators, entities, and countries that are involved in any UNC Chapel Hill sponsored program. Alerts returned through Visual Compliance should be reviewed by the Export Compliance Office before entering into any agreement or transaction involving University of North Carolina.