Using the Export Compliance Substatuses in RAM Tracker

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RAM Tracker has three substatuses under Pending Status which flag a project for Export Compliance review. If you identify any of the listed concerns in your proposal or award, please **select the appropriate substatus.** An email draft will open. **Explain your reason for referral** in one to two sentences.

IMPORTANT: You may flag your email as "URGENT" when the proposal or award turnaround time is 48 hours or less. Please use the following titles in the subject line in these cases:

For **24-hr turnaround**,

"URGENT-24"

For **48-hr turnaround**,

"URGENT-48"

Direct projects to the Export Compliance Office for:

Export Controls: Publication Restrictions Substatus

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

Export Controls: Personnel Restrictions Substatus

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

Notes:
- Non-U.S. persons are individuals who do not hold U.S. citizenship, permanent residency ("green card"), or protected person status.
- FAR and DFARS clauses may entail either publication, information sharing, or personnel restrictions. Consult the Guidance for Sponsored Research Agreements for more information.

Export Controls: Other Concerns Substatus

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 emails, contracts, purchase orders, letters of credit, import documents, invoices, and shipping terms pertaining to business in another country.

Controlled Technology: Government or private sponsors may provide military/defense, dual use, or otherwise controlled technologies (including items, materials, information, and software) to University PIs to perform a research project. These projects are flagged for export controls because these technologies may require authorization to be accessed by non-U.S. persons.

Export Control Terms: The proposal guidelines or award/agreement terms reference export regulations or security restrictions beyond mere adherence to the law (e.g., specify that the project is ITAR- or EAR-controlled, or that the technology has military/ defense application).

International Transfers or Transactions: When research involves the international transfer of physical items, software, or information, an export license may be required, depending on the technology, destination, recipient individual/entity, and purpose. 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: 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 UNC-Chapel Hill.