Background: UC campuses must navigate complex export control regulations which require the classification of controlled commodities, licensing determinations, and implementing policies and training programs. ECAS provides systemwide resource by assessing export control risks, establishing systemwide communication structures, developing guidance and tools, facilitating training for administrators and researchers across the system, responding to campus inquiries, and supporting systemwide export control monitoring and auditing functions.

Framework: The Export Control Compliance Program incorporates key features from the Department of Commerce, Bureau of Industry and Security’s Effective Export Management and Compliance Program, consistent with the framework of the UC systemwide Ethics and Compliance Program.

Goals: The Export Control Compliance Program aims to strengthen the effectiveness of UC’s export control compliance environment and to prevent non-compliance through visible improvements in areas including oversight, policies and procedures, training and education, auditing and monitoring, and response and prevention. ECAS works closely with campus export control leads and administrators to support the Export Control Compliance Program. Specific goals for in implementing the systemwide Export Control Compliance Program include the following:

Oversight:
- Support the Empowered Official for International Traffic in Arms Regulations (ITAR) licensing purposes and facilitate assistance to the campuses for licensing under the Export Administration Regulations (EAR) and the Office of Foreign Assets Control (OFAC). The Senior Vice President/Chief Compliance and Audit Officer and the Executive Director of Research Compliance shall serve as the senior most Empowered Officials on behalf of the UC system
- Exercise reasonable oversight over export control compliance activities, including periodically requesting and receiving information on the implementation and effectiveness of local export control compliance structures, policies and processes, training, and monitoring and response activities
- Develop a systemwide committee/communication structure to help implement the Export Control Compliance Program through workgroup activities and advisory efforts
- Assure that systemwide export control compliance roles and responsibilities are clearly established across the University system, and that due care is taken in delegating substantial authority
- Promote consistent export control compliance across the system, including suggesting modifications to local export control compliance programs as needed

Policies and Procedures:
- Participate in the development of systemize UC Export Control Policy
- Facilitate and support campus policy initiatives requiring a systemwide impact
- Ensure that systemwide export control-related policies and supporting procedures, guidelines, forms, and requirements are accessible online
- Maintain the UC Export Controls Website as a practical toolkit resource
- Assure that export control records retention practices are consistent with the University-wide records retention policies
- Provide advocacy support for federal export regulatory reform through participation in UC responses to proposed rulemaking
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Training and Education:
- Work with local export control administrators to evaluate and coordinate delivery of effective export control compliance education to senior leaders, managers, research faculty and staff across all UC locations.
- Develop and regularly make available train-the-trainer education to campus export control administrators through on campus presentations and via webinar.
- Facilitate and make available systemwide training on new or revised export control policies and processes, and in response to significant incidents of export control-related non-compliance identified in the higher education community.
- Facilitate opportunities for UC personnel to participate in education programs both within the UC as well as with sister institutions.

Monitoring and Auditing:
- Facilitate effective monitoring of location-specific export control practices.
- Interface regularly with campus export control administrators through informal and formal means including responding to campus inquiries, use of listservs, regular in-person and train-the-trainer programs, and active communication by email and phone.
- Provide subject-matter expertise to UC locations as they conduct local auditing and monitoring activities.
- Develop and help campuses implement self-monitoring tools for local export control compliance programs.

Response & Prevention:
- Monitor that University management is maintaining effective mechanisms for UC faculty and staff to seek guidance regarding export control risks and mitigation steps.
- Facilitate systemwide prevention of non-compliance by providing assistance with licensing and classification, restricted party screening, and potential self-disclosures, if needed.
- Report on progress and problems with implementation and effectiveness of the Export Control Compliance Program to the Executive Director of Research Compliance and Senior Vice President/Chief Compliance and Audit Officer.
- Provide tools that prevent non-compliance with export control policies, such as repository for alternative contract wording, checklists, decision trees, documents to track decision processes, and Visual Compliance (ECustoms) and WorldCheck.
- Support local taskforce efforts to establish campus-wide export control workgroups.
- Support local efforts to revise online website guidance as practical toolkits.

Functional Scope:
- Fundamental Research as a primary compliance exclusion.
- Research Funding Contracts, Grants, Material Transfer Agreements (MTAs), Confidentiality Agreements (CDA/NDAs) and Other Agreements.
- Deemed Exports.
- Physical Shipment of Tangible Items.
- International Research Programs and collaborations.
- Purchasing and international financial transactions.
- Provision of Services to non-UC Partners.

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