
Export Control & Overseas Remote Work

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Export Control Officer

Overview - Export Controls

The **federal laws and regulations** that have been established by the U.S. government to control:

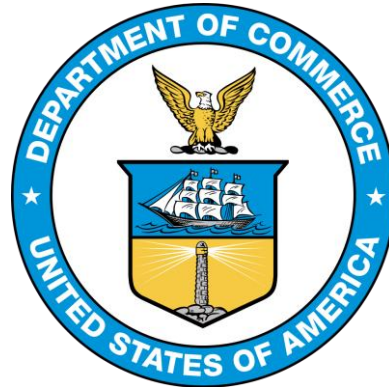
- The export of sensitive equipment, software, and technology
- Trade and financial transactions

These controls are in place to promote national security interests and foreign policy objectives.

Overview - Regulating Agencies



Export of goods, services, and related technical information to individuals located in foreign countries or foreign nationals in the U.S.



U.S. economic and trade sanctions programs

The Impact on UCLA



- Criminal and civil penalties for the University AND individual for violations
- Up to \$1M in fines
- Imprisonment
- Jeopardize federal funding
- Reputational risk

The Situation

Increased number of overseas contract or telework employment arrangements due to the following reasons:

- Highly unprecedented nature of the pandemic
- Work authorization delays
- Travel restrictions

The Export Control Issues

The following aspects of overseas contract or telework require (at minimum*) a license determination:

- Tangible exports (laptops, research equipment, software)
- Export-controlled research or services
- U.S. government restricted individuals or entities
- Transactions with sanctioned/embargoed countries – **Cuba, Crimea region of the Ukraine, Iran, North Korea, Syria**

*Depending on the details, UCLA may need to obtain authorization from the U.S. government.

The Other Issues

Non-exhaustive list of the other risks for overseas contract or telework:

- UC tax liability or penalties
- Subject to host country's laws and regulations
- Legal action and the associated costs of litigation

**!!!PLEASE CONSULT AREAS LIKE CHR, APO, DASHEW CENTER,
AND GLOBAL OPERATIONS SUPPORT FOR HELP PRIOR TO
MOVING FORWARD!!!**

The Request

In addition to the other areas, please contact the Export Control team *prior to* permitting overseas contract or telework.

Components of Review

- Exports – physical and electronic
- Restricted Party Screening
- License Determination
- Referral to additional areas

Thank You!

Please contact the Export Control team at

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