SANCTIONS & EXPORT CONTROL UPDATE
RESEARCH ADMINISTRATION FORUM

March 2022
**OVERVIEW Export Controls**

### WHAT ARE 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.

*export* the shipment, transmission, or transfer of items, information, and software to foreign countries, persons, or entities

### IMPACT ON UCLA

- Research
- Teaching
- Services
- Financial Transactions – payments, purchases
- Travel
- Shipment of tangible items
- Visa beneficiaries
- Violations and reputational risk
UPDATE Russia Sanctions & Export Controls

U.S. DEPARTMENT OF COMMERCE
Bureau of Industry and Security (“BIS”)

- Severely restrict Russia’s access to technologies and items that sustain military capabilities
- Target Russia’s defense, aerospace, and maritime sectors
- Policy of denial on items that were not previously subject to controls: semiconductors, computers, telecommunications, information security equipment, lasers, sensors

U.S. DEPARTMENT OF THE TREASURY
Office of Foreign Assets Control (“OFAC”)

- Target Russia’s two largest financial institutions and other major ones
- Require all U.S. financial institutions to close any correspondent or payable-through accounts and to reject any future transactions
- Russian and Belarus individuals sanctioned

WHAT DOES THIS MEAN FOR UCLA?

- Fundamental Research are not subject to export controls
- Deemed exports are excluded
- License may be required for:
  - Shipping and exchange of information
  - Travel
  - Services
  - Financial Transactions
QUESTIONS & COMMENTS

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