Export Compliance Guidance Document for Sponsored Research

UNC-Chapel Hill works to maintain an open, welcoming atmosphere where visitors and scholars from all over the world can come to learn, collaborate and perform research. UNC’s Export Compliance Office (ECO) is the primary office responsible for assisting University faculty, staff, and students in ensuring export compliance on controlled research projects.

In order to better assist with these efforts, the ECO is providing information on the types of projects or other funding opportunities that may require additional security controls and information sharing restrictions if awarded to UNC.

The following factors are considered “red flags” and if any are answered “yes,” you can contact ECO to better understand the additional requirements associated with that project.

1. Language in an RFP that may require restrictions:
   a. Controlled Unclassified Information (CUI)
   b. For Official Use Only (FOUO)
   c. Covered Defense Information (CDI)
   d. Other restrictions, especially publication restrictions, on information sharing linked to “national security”

2. Certain funding agencies are more likely to have the above language:
   a. Department of Defense (in general)
      i. Army Research Lab
      ii. DARPA
      iii. DTRA
   b. NASA
   c. Department of Energy and National Labs

3. Agreement clauses of concern:
   a. DFARS 252.204-7000 (Disclosure of Information)
   b. DFARS 252.204-7012 (Safeguarding of Unclassified Controlled Technical Information) (NOV 2013)
   c. DFARS 252.204-7008 (Export Controlled Items)
   d. DFARS 252.225-7048 (Export Controlled Items)
   e. DFARS 252.227-7025 (Limitations on the Use or Disclosure of Government Furnished Information Marked with Restrictive Legends)
   f. FAR 52.204-2 (Security Requirements)
   g. FAR 52.227-14 (Rights in Data)
   h. FAR 52.227-17 (Rights in Data Special Works)
   i. ARL 52.005-4401 (Release of Information)
   j. ARL 52.004-4400 (Foreign Nationals Performing Under Contract)
   k. AFMC 5352.227-9000 (Export Control Data Restrictions)
   l. DEAR 952.204-71 (Sensitive Foreign Nations Controls) (March 2011)

If you see any of these listed terms or clauses in an RFP or award, contact ECO to get started on appropriate security controls that are required via the contract/award. The primary office that is responsible for managing and negotiating sponsored research projects is the Office of Sponsored Programs (OSP). Please reach out to OSP with any specific questions concerning sponsored research you may be involved with.