出口控制政策

目的:
UM雇用外国国民并经常接待外国访客，以进行国际交流项目、授予学位的项目和其他商务协议。虽然UM欢迎有机会雇用外国国民和接待国际访客，但它也必须保证遵守适用于特定商品和技术数据的出口控制法令和规定。

出口控制法令和规定适用于和影响包括研究和学术活动，软件开发，雇用，学生的选择和教育，实验室安全，技术转让，采购，接收和运载，国际旅行，教育研究和技术信息的交换，以及对访客校园活动的责任。不遵守出口控制法令和规定不仅会直接影响到参与违反行为的个人（或实体），同时也会对UM造成影响。刑事和民事的处罚可能会非常严厉，可能会包括监禁，驱逐出境，或吊销执照。其他行政性制裁可能会包括研究资金和出口特权的丧失。

范围:
所有UM人员必须了解联邦和非联邦法令和规定，以及单个资助活动的条款和条件。虽然遵守所有适用的法令是至关重要的，但同样重要的是保持一个欢迎来自世界各地的研究者的开放研究环境，这符合UM的使命。

本政策适用于所有UM人员，包括:
- 教授，包括志愿教授。
- 退休教授作为主动研究员的UM研究活动。
- 研究人员，包括研究工作人员，博士后研究员，和研究助理。
- 研究生，本科生和参与研究项目的实习生。

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1 原文注释：外国国民是指任何美国公民，永久居民（绿卡持有者），或受美国难民或庇护保护的个人。
• Staff in departments, centers, institutes, and administrative offices charged with responsibilities under this policy.
• Consultants, agents, and volunteers associated with research and scholarly activities, as well as in departments and offices charged with responsibilities under this policy.

POLICY:
It is the policy of the University of Miami (UM) to comply with all U.S. export control laws and regulations, and to develop and maintain an export compliance program that enables UM employees, faculty, students, trainees, visiting scientists, and other persons, herein referred to as "UM personnel," retained by or working at or for UM to conduct business in accordance with these laws and regulations. No UM personnel may engage in any export activity that is prohibited by the U.S. Department of Commerce, the U.S. Department of State, the U.S. Department of Treasury's Office of Foreign Assets Control, or any other government agency that enforces export laws/regulations. Similarly no UM personnel may transfer any controlled item, including technology and technical data, without approved documentation.

Compliance with export control laws and regulations must be considered and achieved before traveling internationally, engaging in science or technology-based research, executing contracts or other agreements, purchasing high-technology devices or software, or engaging in any other activity that may be affected by export controls.

Export control requirements are constantly changing. Governmental and inter-governmental agencies in the U.S. and abroad are evaluating their regulations and protocols as a result of new laws and directives, as well as administrative and judicial experience. While this policy will be reviewed and revised on a regular basis, it is essential that all UM personnel keep current with information and training provided by the Director, Export Control Compliance within the Office of Research Administration.

The Assoc. Vice President for the Office of Research Administration and the Director, Export Control Compliance are UM's Empowered Officials.

DEFINITIONS:
Please refer to UM’s ORA website for a list of acronyms and terms commonly used in sponsored/ research administration grants, contracts, and cooperative agreements: http://ora.miami.edu/_assets/pdf/ora-policies/glossary.pdf

PROCEDURE:
UM personnel are to use UM's Office of Research Administration website for guidance on matters pertaining to export controls.

UM personnel are to follow the Standard Operating Procedures (SOP) outlined as well as utilize the various required forms and templates that have been implemented for the activities that fall under the management of the ECO. (e.g., Purchase requisitions, hiring foreign nationals, observerships, technology control plan, federally funded research, shipping, international travel)
Where the Office of Research Administration website fails to provide the information or resources needed, UM personnel should contact the Director, Export Control Compliance directly for consultation. Contact information for the Director can be found on the Office of Research Administration website.