o UD interactions and collaborations with Foreign Entities involving Items of Value (IOVs) (regardless of value) include:

1. Contracts
2. Grants
3. Restricted Gifts
4. Unrestricted Gifts
5. Various Collaboration Vehicles (Consortium Memberships, etc.)

o Typically, IOVs enter UD via UD Research Office (RO) or UD Development Office (including College Development Offices)

o This approach suggests IOVs at UD can addressed under auspices of U.S. Code of Federal Regulations (CFRs) and its provisions for Commerce & Foreign Trade … in sum:

o Are IOVs from Country of Origin that is embargoed by U.S. Department of Treasury?

1. Office of Foreign Asset Control (OFAC)
2. Burma, Cote d’Ivoire, Cuba, Iran, North Korea, and Syria (fully embargoed)
3. Interaction/Collaboration OFAC sanctioned

o Are IOVs’ Country of Origin on 15 CFR 740 Supplement No. 1, Group B List?

1. Export Administration Regulations (EAR)
2. EAR requires Licenses for countries based on Five-Category Concerns (National Security, Nuclear Proliferation, Chemical & Biological, Missile Technology, and U.S. Arms Embargoed Countries)
3. U.S. Department of Commerce authorizes License Exception for the group of countries categorized as Group B (GBS) (ref. Paragraph 740.4) when basis of concern is ***National Security*** (basis of suggested-UD approach)

o IOVs considered by UD from Non-Group B Countries should be referred to RO for processing/oversight (note: presently, both UD Export Control Empowered Officials are appointed in RO)

o RO to contact UD Researcher/Employee

1. RO to provide “Concern/Problem-Related” materials (letters, news articles, etc., where applicable) to Researcher/Employee, associated Chair/Supervisor and Dean/VP
2. RO to conduct background conversation with Researcher/Employee (addressing IOV objective/purpose)
3. To move forward, Researcher must provide RO written and signed statement of IOV objective/purpose
4. To move forward, IOV objective/purpose statement must be approved (and signed) by Chair/Supervisor and Dean/VP
5. Researcher/Employee, Chair/Supervisor, Dean/VP approved-IOV moved forward to Research VP for recommendation
6. Research VP recommendation moved forward to Provost/Executive VP for UD adjudication

o If UD desires to move forward with IOV, specifics/details may cause Research VP to require export-license application or technology control-plan protocol