



Date: October 30, 2023

From: Phil Distefano, Chancellor

Subject: University of Colorado Boulder's Commitment to Export Control¹

University of Colorado Boulder is a public research university serving Colorado, the nation, and the world through leadership in high-quality education, public service, and groundbreaking research. The CU Boulder research enterprise considers all collaborations (both domestic and international) and academic freedom as the foundation of innovative basic and applied research. The university remains open to the exchange of ideas, to collaborations across the world, and to attracting and retaining a vibrant community of scholars.

As the University fulfills its mission, the Laws of the Regents and the university's Code of Conduct provide that all members of the university community are responsible for understanding and upholding the highest standards of legal and ethical conduct. The University is committed to protecting the national security and foreign policy interests of the United States by complying with all U.S. export control laws and regulations, including the Export Administration Regulations implemented by the Department of Commerce, International Traffic in Arms Regulations implemented by the Department of State, and regulations implemented by the Treasury Department through its Office of Foreign Assets Control.

Export controls compliance requires a proactive, university-wide commitment, and every individual plays a role in ensuring the security and integrity of the University's export controls program. It is important that faculty, staff, and students understand their obligations, especially since export controls have grown in breadth and complexity in recent years. Federal laws restrict the export of certain goods and technical information (also referred to as "technology") and increasingly shape the way in which university researchers can engage with export-controlled technology and the degree to which they may be able to share their results. Notably, export controls are not limited to the export of physical items, software, or technology to destinations outside of the U.S. Export controls can also restrict the release of technology or source code to a foreign person located within the U.S., known as a "deemed export." Deemed exports can happen in the context of presentations, emails, conversations, trainings, participation in research programs, and site tours.

Violations of export control laws may give rise to personal and institutional liabilities, both civil and criminal, and therefore require support and dedication to uphold the requirements. All members of the CU Boulder campus shall familiarize themselves with the campus [policy](#), [the university's export controls requirements](#), and complete appropriate trainings. Help can be provided by [contacting](#) CU Boulder's Office of Export Controls for guidance. CU Boulder remains committed to dedicating the appropriate resources necessary to support our faculty and staff as they navigate compliance with export controls requirements.

Thank you for your continued commitment to upholding U.S. export control laws and regulations.

DocuSigned by:
Philip DiStefano
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¹ Note: This memo supersedes the previous communication dated January 22, 2013