



The UNIVERSITY of OKLAHOMA.
Office of the Vice President for Research & Partnerships

TO: University of Oklahoma Faculty and Researchers

FROM: Tomás Díaz de la Rubia, Vice President for Research and Partnerships 

DATE: October 12, 2020

SUBJECT: **Office of Export Control and Secure Research Operations High Risk/Restricted Party Interim Policy**

University research has long supported and depended upon international partnerships and collaborations. While highly encouraging and celebrating such global partnerships and relations, the University is also aware of reports and guidance from the United States Government that have drawn attention to the risks that relationships with high-risk individuals and entities, including certain foreign governments, may violate core principles of scientific integrity and national security. In an effort to provide guidance and consistency to faculty and researchers, an interim policy on engagement with high risk individuals and entities has been developed (see attached policy – University of Oklahoma Office of Export Control and Secure Research Operations High Risk/Restricted Party Interim Policy).

The University of Oklahoma’s Office of Export Control and Secure Research Operations is charged with conducting Restricted Party Screenings that identify high-risk individuals and entities. These screenings must be conducted on the following, prior to the initiation of research-related activities or transactions:

- Visiting scholars and their previous institutions,
- Graduate students and their previous institutions,
- Foreign entities (includes institutions, companies, individuals) entering into contracts or agreements
- Foreign entities sharing or receiving technology,
- Purchases from foreign entities, and
- Others, as otherwise required by law or University policy.

The results of these screenings identify individuals and entities that are enumerated on restricted party lists published by the U.S. Departments of Commerce, State, and Treasury, and by other Governmental entities. If individuals or entities are on a restricted party list, the following will occur:



There is a policy of denial for any interactions with:

- Individuals or entities that are enumerated on the Denied Persons List
- Members of Seven Sons of National Defense Universities that currently include:
 - Beijing Institute of Technology
 - Beihang University
 - Harbin Engineering University
 - Harbin Institute of Technology
 - Nanjing University of Aeronautics and Astronautics
 - Nanjing University of Science and Technology
 - Northwestern Polytechnical University

There will be an evaluation on a case-by case basis of any proposed interactions with individuals and entities:

- On the Entity List
- On the Unverified List or
- On other lists from the U.S. Departments of State, Commerce, or Treasury

This policy is effective starting October 12, 2020, for all screenings on or after this date.

The Office of Export Control and Secure Research Operations will continue to work with faculty and staff to communicate this interim policy, while ensuring that research continues to grow and thrive at the University of Oklahoma.

Attachment: University of Oklahoma Office of Export Control and Secure Research Operations High Risk/Restricted Party Interim Policy