The University of South Florida System (USF System) supports and encourages international research and service. While the overall process for domestic grants is in place, and applies equally to international projects, there are at least two areas that require extra review: potential export control issues and the process of transference of funds to or from a foreign country. The USF System is committed to helping researchers address and manage these special requirements and risks that are often involved when conducting international projects. In an effort to explore all possible avenues to support and promote this USF System initiative, an overview is presented below of the current processes in place.

The USF System Office of Export Controls (OEC) works closely with the Division of Sponsored Research (DSR), USF World, International Services, and Education Abroad in an effort to provide regulatory advice and support, being sensitive to the need to notify faculty as early as possible in the project should there emerge a contingency or issue that would deem pursuing the project not viable.

**Broad Overview of the Process**

Since international research projects are often large and complex in nature, DSR’s Research Development Services (RDS) Team is available to assist Principal
Investigators (PI) in coordinating their responses to program solicitations or requests for proposals.

PIs whose projects do not meet the large and complex criteria will work directly with the Export Control Officer (ECO) and the appropriate Sponsored Research Administrator (SRA) to respond to funding announcements.

In both instances, these proposals are managed as outlined below.

- PI notifies DSR of his/her interest in submitting an international research proposal.
- RDS contacts USF World to identify potential collaborators from their Faculty International Engagement and Activities database.
- RDS utilizes PIVOT/Community of Science to identify potential collaborators for the project – both internal and external to the USF System.
- ECO receives a copy of or link to the funding announcement of interest for review.
- ECO will also review the scope of work, if available, and speak with the PI about the nature of the research and the country in which it will occur.

Through a series of strategic questions, the ECO will determine whether or not the project requires further review.

- The goal of the ECO to identify only those types of international projects that might need special assistance (e.g., a project requiring a long-term formal
presence in another country, sensitive technology, or the ability to operate within a country that is subject to export sanctions).

- If the project is deemed to have potential export control issues, the ECO tracks the progress of the project in the Global Support Database. This database is used to quickly identify and monitor proposals that have potential of global risk issues.

- RDS meets with an ad hoc team (PI, SRA, Department Research Administrator, ECO, International Risk & Security Analyst, General Counsel, RFM, Payroll, Purchasing, and others as relevant to the project) to discuss the potential export control and international concerns that may arise from pursuing the project.

- ECO and the DSR SRA authenticate the sponsor and potential collaborators in Visual Compliance to ensure there are no potential limitations or exclusions to working with the sponsor and/or collaborator(s).

- ECO provides a brief analysis of the proposed research that includes:
  - Reviewing the technology to be used in the researcher project to determine whether export controls require licensing.
  - The need for license exceptions and exemptions related to travel outside the United States are determined as follows:
    - Specific country information
    - Sanctions, sensitivity, State Department warnings
- Restricted Party and Entity Screening procedures
- Counter Intelligence notifications

- The RDS Team is responsible for serving as project managers to ensure that all identified requirements are coordinated and met; keeping the appropriate SRA, ECO, and USF World representative informed.

- Proposal submissions are handled by the appropriate college/campus/unit SRA.

**Financial**

The University Controller and Research Financial Management oversee the transfer and management of any and all funds for international projects as they do for domestic contracts and grants. However, there are special requirements associated with foreign currency, such as taxes, fees, and exchange rates.

**Audits**

Auditing international research projects poses a special challenge, due in part to the fact that foreign laws, access to records, and distance come into play. Close collaboration with the University Audit & Compliance team is essential, and current processes may need to be further developed as international research expands.
Conclusion

The complexity of international research raises many questions and involves numerous areas system-wide, all of which bring to the table their own wealth of expertise to guide researchers through the complex and often rapidly changing world of international research. While the risks are varied and present some new challenges, our current processes are designed to ensure first-rate support for our faculty.