



University of California, Merced  
5200 N. Lake Road  
Merced, CA 95343

March 18, 2020

EXPORT CONTROL OFFICER

RE: **Delegation of Authority – Authority as Export Control Officer to Implement and Manage the UC Merced Export Control Compliance Program (UCOP Export Control Policy)**

In accordance with University of California Export Control Policy, campus leadership is responsible for creating a local Export Control Compliance program that is consistent with systemwide policy and must designate an Export Control Officer responsible for providing resources and oversight to effectively administer the Export Control Program.

Effective immediately as Vice Chancellor for Research and pursuant to my authority, I designate you as the Export Control Officer (ECO) with authority to effectively implement the local compliance program. In accordance with UC policy, the ECO:

- Serves as primary point of contact and subject matter expert and is responsible for monitoring and oversight of the local compliance program, including regular assessments.
  - Reviews applicability of export control regulations and determines options for export licensing, exceptions, or control plans to mitigate risk.
  - Consults with persons involved in transactions (researchers or staff) to understand the technology and specifics of a situation.
  - Ensures associated offices (other administrative offices at our location) and their gatekeepers have appropriate education, training, and procedures. All offices should work in coordination with ECO and other offices to create procedures and implement as appropriate.
  - Ensures program raises awareness and is known so that faculty, staff, students and others that work in high-risk areas can identify activities that may have export control implications and seek guidance from experts when appropriate.
  - Satisfies recordkeeping requirements for all U.S. export control regulations (e.g., EAR, OFAC, ITAR, DOE, FTR, and NRC)
  - Responds promptly to reports of non-compliance: potential violations, escalations, reviews and /or investigations, and take appropriate action to correct and prevent future violations.
  - Discloses violations to the relevant government agency.
- Source of authority: **Export Control Policy**
- This delegation is subject to all other University and Merced campus policies and procedures. Exercise of this authority shall be subject to the conditions set forth in the University of California, Export Control Policy.

This authority **may not be further re-delegated** by you.

Sincerely,

Sam Traina  
Vice Chancellor for Research

cc: Controlled Substances Program Administrator, Karen Smith  
Chief Procurement Officer, Joshua Dubroff  
Director of Environmental Health and Safety, Mal Donohue  
Director of Ethics and Compliance, ECAR, Viola Kinsman