

XIV. EXPORT CONTROL

A. POLICY

1. It is AURA policy that all employees, visitors, grantees, or other individuals utilizing AURA facilities comply with United States export policies and regulations as proscribed by the Department of Commerce's Bureau of Industry and Security (15CFR Parts 730-774), the Department of State's Directorate of Defense Trade Controls (22CFR Parts 120-130), the Department of Treasury's Office of Foreign Assets Control (31CFR Parts 500-598) and any other agency of the federal government regulating exports. Under no circumstances will any individual operating on behalf of AURA be authorized to export materials, technology, data or services contrary to U.S. export regulations.
2. Violations of the export control regulations or licenses issued under those regulations, including conspiracies to violate, are subject to severe criminal and civil penalties by the U.S. government including, but not limited, to those listed in 15CFR764, 22CFR127 and 31CFR501. In addition, violations of this policy will result in appropriate disciplinary actions by AURA with respect to the employment of the individual(s) involved.
3. Questions concerning the export regulations should be directed to the following:
 - a. AURA Import/Export Officer for GEMINI, LSST, NOAO and NSO, Orion Wiest (520) 318-8161 (owiest@aura-astronomy.org)
 - b. AURA Import/Export Officer for the Space Telescope Science Institute, Lynn Kozloski (410) 338-4355 (kozloski@stsci.edu)

Should any AURA employee become aware of violations of U.S. export regulations at any AURA facility, they should report such violations to the appropriate AURA Import/Export Officer, follow the procedures identified in the Whistleblower Policy, report violations to the AURA President, or report directly to the appropriate controlling agency.