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FROM: Dr. Melur K. "Ram" Ramasubramanian
Executive Vice Chancellor for Academic Affairs and Provost,
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President, The Research Foundation for SUNY

DATE: June 1, 2026

SUBJECT: Export Control Laws and Regulations

The Research Foundation for SUNY provides talent, services, and technology that empower SUNY to research, innovate, and transfer discoveries that transform the world's knowledge economy. While pursuing this mission, the RF is committed to assuring due diligence and compliance with federal export control laws and regulations, which protect U.S. national security, foreign policy, and economic interests. These regulations include, but are not limited to, the Export Administration Regulations ("EAR"), the International Traffic in Arms Regulations ("ITAR"), and sanctions administered and enforced by the Office of Foreign Assets Control ("OFAC").

All individuals performing work on behalf of the RF must understand any export control regulations that relate to their work responsibilities and exercise due diligence to ensure compliance with these regulations.

Activities that could create export control concerns include:

- Shipping items from the U.S. to a foreign country;
- Transferring technology, information, or technical data to entities or individuals outside of the U.S.;
- Providing services to, or conducting financial transactions with, an embargoed or boycotted country, restricted individual, or entity; and
- Sharing technology, information, technical data, or software source code with a foreign person within the U.S. This is referred to as a deemed export: A "deemed" export situation can occur by access, disclosure, or use of technology and technical data provided to a foreign person within the U.S. for research or training purposes, visual inspection, or a verbal exchange of information.



Although certain exceptions to the general export control requirements may exist, these exceptions must be determined on a case-by-case basis with the help of qualified personnel. Violations of export control laws may result in severe civil and criminal penalties for both individuals and the RF. The Research Foundation provides resources and training materials to enable employees and representatives to understand the regulations and when they apply. RF employees and representatives with questions about specific applications of export control regulations can contact their campus sponsored programs office or the RF Central Office at: RFLegal@rfsuny.org or RFCOSponsoredPrograms@rfsuny.org.

More information regarding export control requirements can be found at: <http://www.rfsuny.org>.

Sincerely,

DocuSigned by:

Ram Ramasubramanian

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Melur K. "Ram" Ramasubramanian
President