

Financial Support Services Export Control Guidelines

The University of Oklahoma Financial Support Services is a service and support office. FSS performs the financial services of the University of Oklahoma. Their responsibilities and duties include, but are not limited to; maintaining and operating the University's financial accounting system, processing travel claims, coordinating and reporting the financial activities of auxiliary enterprises, service units, and the Regents' Fund, and processing payments for University obligations to outside entities. It is in these endeavors that FSS may encounter export controls in the form of sanctions or restricted parties.

The Office of Foreign Assets Control (OFAC) is responsible for administering sanctions. The United States Government places sanctions on countries to protect national security and advance foreign policy goals. The U.S. Government has designated four countries as "State Sponsors of Terrorism". These countries are Cuba, Iran, Sudan, and Syria. Permitted interaction with these countries is extremely limited and exports are prohibited. This includes financial dealings and payments. In addition, the transfer of funds to Burma is prohibited. OFAC also administers the list of Specially Designated Nationals (SDN). The SDN list is comprised of organizations and individuals who are prohibited from doing business with the United States, American companies or organizations, or American individuals.

In the execution of their duties, FSS staff may encounter export control issues, especially sanctions. If any "red flags" are found, the Office of Export Controls should be contacted and the red flag resolved before a payment is made.

Criminal and civil penalties exist for violations of export control laws and sanctions. These penalties can apply whether the penalized action was taken knowingly or not. The following guidelines have been created to assist FSS in identifying and addressing export control and sanction concerns. Please contact the Office of Export Controls with any questions.

Guidelines

1. Is the payee on the SDN list?
2. Is the payee located in a T-4 country: Cuba, Iran, Sudan, Syria
3. Is the payee located in Burma?
4. Is proposed travel to a T-5 country: Cuba, Iran, North Korea, Sudan, Syria?

If “yes” can be answered to any of the above questions, please contact the Office of Export Controls.

CONTACT:

Please contact the Office of Export Controls with any questions.

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