Projects with Publication and/or Personnel Restrictions

How is research with restrictions on personnel and/or publication different from research without such restrictions?

Export control laws do not apply to “fundamental research” projects, defined as basic and applied research, the result of which are ordinarily published and disseminated broadly without restrictions (such as sponsor-imposed pre-publication review requirements or nationality-based participation restrictions). However, export control restrictions do apply if there are restrictions on publication and/or personnel and may require implementing various measures to adhere to their requirements.

Does USC accept restricted research projects?

USC generally does not accept research projects that have restrictions on publication and/or personnel (e.g., restrictions on the dissemination of research results, restrictions on who can participate in the research on the basis of nationality, etc.). However, USC may consider requests from investigators to accept sponsored research agreements that propose these types of restrictions on an exception basis.

How do I obtain approval to conduct a restricted research project?

Researchers wishing to conduct restricted research must submit a proposal exception request to the Office of Culture, Ethics and Compliance (OCEC). Exception requests are reviewed by USC’s International Collaborations and Export Controls Committee, a standing faculty committee chaired by the Vice President for Research. The process for requesting approval to conduct restricted research is described in detail in USC’s International Collaborations and Export Controls policy. Highlights of the process include:

- The Department of Contracts and Grants (DCG) identifies restriction(s) in the solicitation.
- The proposal exception request memo is submitted to OCEC for an administrative pre-review.
- The memo is reviewed by the International Collaborations and Export Control Committee.
- If the request is approved, a management plan will be put in place outlining the required measures that must be implemented to comply with export regulations and sponsor restrictions.
- OCEC provides guidance on implementation of management plan requirements and periodically monitors the project to ensure compliance with the management plan and sponsor requirements.

How do I submit a proposal exception request?

OCEC has created a straightforward template that seeks all required information necessary for an appropriate review of the project and associated restrictions. The template is available from the OCEC website at https://ooc.usc.edu/international-activity/exception-request-to-conduct-restricted-research/.

I’d like to learn more about restricted research and export controls. Where can I find additional information?

Additional information about restricted research, export control compliance and the exception request process can be found on the OCEC website, https://ooc.usc.edu/international-activity/research/ or in USC’s International Collaborations and Export Controls policy. If you have additional questions, please contact Emily Pender, Manager of Export Controls, at epender@usc.edu.