Export Control Overview

Export control laws and regulations affect various University activities including, but not limited to conducting research (sponsored and unsponsored), international travel, publishing research, procurement, hiring non-U.S. persons, sponsoring foreign persons (e.g., visiting scholars), collaborations with non-U.S. individuals or entities, international shipments, non-disclosure agreements, and certain services to embargoed or sanctioned countries.

What may trigger export control requirements?

There are several activities that have potential export control implications. Contact the Office of Research for guidance if you have questions about:

- International Travel
- International shipment of goods, services, information, or technology
- Research projects where any part of the research will take place outside the U.S.
- International Presentations
- Working with foreign collaborators, whether in the United States or overseas
- Working with controlled items (i.e., commodities, software, technology, or equipment)
  Examples include but are not limited to: lasers, thermal imaging cameras, high performance computers, space technology & satellites, advanced GPS, technical data, software, encryption technology, Dual use items
- Working with Dual Use items– commercial items with potential military or national security applications
- Research project is military, space-related, or has other implications to national security
- Research project is sponsored by the DOD or a defense contractor
- Sponsored projects containing an export control clause
- Sponsored projects containing restrictions on publication or dissemination
- Sponsored projects containing personnel restriction
- Foreign persons, international students, or visiting scholars participating in a restricted project
- Doing any work with a person, business or organization that is a citizen of or headquartered in Iran, Syria, Sudan, North Korea, Cuba or the Crimea

How can export controls affect my research?

Several scenarios that require additional precautions and may require a Technology Control Plan (TCP) and/or an export license include, but are not limited to:

- Indications from the sponsor or others that controlled information or technology will be furnished for use in the research
- International field work/travel
- Research collaborations with foreign entities or foreign nationals
- A physical transfer/disclosure of controlled goods or technology outside the U.S.
- Any transfer/disclosure of a controlled item or information within the U.S. to a foreign national

- Presentation/discussion of previously unpublished controlled research at international conferences or U.S. conferences where foreign national scholars may be in attendance
- Visits to your lab by foreign national scholars
- Sponsor restrictions on the participation of foreign nationals in the research
- Sponsor restrictions on the publication or disclosure of the research results

As a principal investigator (PI), what do I need to do?

PIs are expected to have the best understanding of their research. As such, they should know whether specific technology, data, or information related to their research is subject to export control regulations. PIs are responsible for:

- Indicating on the WISPER record/Proposal that the proposed work may be subject to U.S. export control regulations.
- Notifying the Office of Research prior to implementing any changes that may give rise to the application of export controls, such as a change in the scope of work or the addition of new staff to the project after work on the project has begun.
- Cooperating fully with Office of Research personnel to determine the application of export control regulations to proposed research if any export control issues are identified at the contract or grant proposal stage.
- Development of a Technology Control Plan for management of controlled data, information, technology, equipment, etc., as needed.
- Adhering to any applicable restrictions and cooperating fully with the University's efforts to monitor compliance if it is determined that export controls apply to a project.