

## Export Controls - International Travel & Research

“Export Controls” are U.S. laws and regulations that govern the transfer of controlled materials or information to either foreign countries or foreign nationals. These laws and regulations are detailed and complex. *Note that export controls apply to all international activities regardless of whether external grant funding supports them.*

In general, in addition to regulating what is commonly known as exports (the shipment, transfer or transmission of items outside the U.S.), U.S. export controls laws also apply when research, data, and technology (such as software or source code) are released. Export activities also include “deemed exports,” which are written, oral, or electronic communications to foreign nationals, carrying items “by hand” when traveling overseas, or providing access to equipment, facilities, or professional services to foreign nationals.

Basic and applied research in science and engineering – research with results that are capable of being published and shared broadly without any conditions of review or approval – conducted on campus or with affiliated U.S. institutions is covered by the Fundamental Research Exemption and not subject to export controls.

This exemption is relatively broad, but it is limited to the transfer of information, and would not permit the transfer of tangible items outside the U.S. In addition, the Fundamental Research Exemption may not apply to research that is conducted abroad by Vassar researchers.

Some issues to consider with respect to export controls include:

- Project performance site(s) and whether any site other than a U.S. academic/hospital research facility will be used;
- Whether any portion of the research will be conducted outside the U.S., or involve shipping or carrying items into a foreign country;
- Whether research results or deliverables will be shared with collaborators in a foreign country or foreign nationals prior to publication;
- Whether the funding agency or collaborator(s) indicates that export-controlled materials or items cannot be shared with non-US citizens; and
- Whether researchers will be taking materials or items – including, but not limited to, a college laptop – to countries that are subject to sanctions. The federal government may prohibit taking electronics, data, or software to these countries. For example, taking a college laptop with standard software and no specialized data to certain embargoed countries is prohibited. Countries currently subject to sanctions include: the Balkans, Belarus, Burma, Cote D'Ivoire (Ivory Coast), Cuba, Democratic Republic of Congo, Iran, Iraq, Liberia, North Korea, Sudan, Syria, and Zimbabwe. The list of sanctioned countries is updated periodically and is available [here](#).

Faculty traveling with college laptops or other equipment may need specialized training to understand the associated implications, risks, and responsibilities. Researchers should consult with the Grants Office with questions or concerns about export control laws.