University of Richmond
Faculty International Travel and Export Controls

What Are Export Control Regulations?

Export control regulations are United States federal laws that prohibit the unlicensed export of certain commodities or information for reasons of national security or protections of trade. Export controls usually arise for one or more of the following reasons:

- The nature of the export has actual or potential military applications or economic protection issues.
- Government concerns about the destination country, organization, or individual.
- Government concerns about the declared or suspected end use or the end user of the export.

What Is an Export?

When you leave the United States, *everything you take is considered an export*, including devices, software and data.

An export is any oral, written, electronic, or visual disclosure, shipment, transfer, or transmission of commodities, technology, information, technical data, assistance, or software codes to

- Anyone outside the U.S., including a U.S. citizen
- A non-U.S. individual wherever they are (deemed export)
- A foreign embassy or affiliate

Why Should You Care?

Jail sentences have been mandated for faculty members who break compliance rules in spending grant dollars and who transgress export controls. Universities also face significant penalties for violations. Registering your travel in advance allows the University to:

- Comply with export control laws
- Provide you with appropriate resources
- Help promote your safety and security
- Help ensure the integrity of your data and research

What About the Fundamental Research Exclusion?

Work outside the United States is ineligible for the Fundamental Research Exclusion. To qualify as Fundamental Research, research must be conducted at an accredited institution of higher education located in the United States. For more information regarding export control within research please see (LINK)

What Should You Do?

1. If you are traveling internationally on University business, register your travel here.

2. Complete the Checklist below. It will help identify potential export control issues.

3. When completing the checklist, think about the purpose of your trip, who you plan to interact with, what you will take, where you will go and how long will you be gone.

4. If you check YES to any of the items on this checklist, you should seek guidance from the compliance office at khender3@richmond.edu as soon as possible prior to your departure.

University of Richmond
Faculty International Travel and Export Controls
Traveler Checklist

	Unknown	Yes	No
Where are you traveling? Will you travel to an embargoed or sanctions destination? Travel to certain countries may require an export license for travel or may have sanctions against the export of certain items. ***Do not just consider your final destination; make sure to consider transit stops and other destinations en-route to your final destination.*** Current embargoed and sanctioned countries include: Cuba, N. Korea, Iran, Syria, Sudan, the Crimea Region of Ukraine, Burundi, Central African Republic, Democratic Republic of the Congo, Libya, Lebanon, Sudan, South Sudan, Somalia, Belarus, Iraq, Yemen, Russia/Ukraine, Venezuela, and Zimbabwe. This list is dynamic and changing, Visit the Office of Foreign Assets Control ("OFAC") site for the most current countries information, https://home.treasury.gov/policy-issues/financial-sanctions/sanctions-programs-and-country-information			

What will you be taking?
Will you be taking information, technology or items subject to export control regulations and not widely available in the public domain?
    a. Research equipment
    b. Laptop or any electronic device with any software other than what is commonly commercially available
    c. Any biological or chemical materials or samples
    d. Controlled or proprietary data
       https://www.bis.doc.gov/index.php/regulations/commerce-control-list-ccl
       https://www.pmddtc.state.gov/ddtc_public?id=ddtc_public_portal_itar_landing			

What will you be doing? Will your activities involve presenting or sharing information not in the public domain?			
Who will you be interacting with? If you are formally interacting with foreign nationals as part of your travel, restrictions may apply. Additionally, payments or financial transactions with a non-U.S. individual, business, or entity may be prohibited by export control laws and regulations and should be screened against the sanctioned party and entity lists (This includes agreements performable outside the United States, making payments to foreign vendors, engaging collaborative projects/activities) **Please review the List of Parties of Concern to ensure legal compliance.** https://www.bis.doc.gov/index.php/policy-guidance/lists-of-parties-of-concern			

What About Imports?

Multiple Federal agencies regulate the importation of goods into the United States. Regulatory jurisdiction is determined by the type of good being imported.

The Department of Homeland Security's Customs and Border Protection agency (CBP) is the United States' primary border enforcement organization. CBP is responsible for protecting and facilitating cross border trade by assessing and collecting duties, taxes, and other fees incident to international trade and verifying incoming items comply with US import regulations.

General Resources:
Importing Animals and Animal Products: USDA/APHIS
https://www.aphis.usda.gov/aphis/ourfocus/animalhealth/animal-and-animal-product-import-information/animal-and-animal-products-imports

Importing Plants, Soil, Plant Pests and Plant Products: USDA/PPQ
https://www.aphis.usda.gov/aphis/ourfocus/planthealth/import-information

Importing Food, Drugs, Medical Products, Cosmetics, and Tobacco Product: FDA
https://www.fda.gov/industry/import-program-food-and-drug-administration-fda

Importing Human Pathogens, Infectious Substances, and Vectors of Human Disease: HHS/CDC
https://www.cdc.gov/cpr/ipp/index.htm

Importing Chemicals: EPA/ Toxic Substances Control Act
https://www.epa.gov/sites/default/files/2015-03/documents/checklist.pdf

What About Visas, Vaccines and Insurance?

The Office of International Education has pulled together useful resources for faculty members traveling abroad and covers information on Visas, Vaccines and Insurance..
https://international.richmond.edu/faculty-staff/guidelines/index.html

Additional helpful resources for faculty traveling internationally:
⇒ https://travel.state.gov/content/travel/en/international-travel/before-you-go/about-our-new-products.html
⇒ https://www.du.edu/it/sites/default/files/2018-02/FBI_best_practices_academics.pdf

What If You Have Additional Questions?

If you have additional questions regarding travelling abroad, please reach out to the Office of International Education (insert link) or to the Compliance Office (khender3@richmond.edu)