MIT Massachusetts Institute of Technology

Export Control Compliance

"**Protecting MIT's open research policy and the free interchange of information among scholars while complying with U.S. Export Control Law**"

Janet C. Johnston
Senior Export Control Officer

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The Top 6 Things You Should Know About International Travel

- Everything that crosses the border is an export!

- What types of things are export controlled?

- Material doesn't have to be dangerous to be controlled.

- Interactions with certain international entities and persons are restricted

- Advice on travelling with laptops and phones

- Advice on travelling with other equipment

What's an Export?

Export

Everything that crosses the border is an export...

Products, Equipment, Materials, Software, Technology, Information, and "Services"

> **...even if it's temporary**

> **…even if hand-carried**

> > **...even if it will be used for research**

> > **...even if the item was made in that country**

"Deemed" Export*

Disclosing controlled information to non-US entity or individual — even in the US, even on campus

- **ITAR: license for all non-US (some exceptions)**
- **EAR: License required some nationalities**
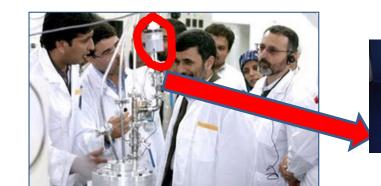
*Only refers to technology and software

Services

Broadly defined. Examples: Instruction, or advice, giving a keynote speech, accepting an award.

12/9/22

How do the Regulations Differ?

- **_Sanctions_** on a country are usually to punish, coerce, or sometimes target a specific tech area (Comprehensively sanctioned countries: Iran, N. Korea, Syria, Crimea, Cuba. Other countries of concern: Russia, Belarus, occupied Ukraine areas, and Venezuela)

- **_Export Restrictions_** (e.g., ITAR, EAR, DOE) are to prevent potentially dangerous material from getting into the wrong hands

- **_Denied/restricted parties_** are specific to persons or institutions--entities list, SDNs, etc.
  (Check with ECO ahead of time if you know what organizations you are visiting)

Pressure transducer (chokepoint tech for Nuclear Enrichment); source: "MKS, North Andover, MA"

Advice

Laptops/Mobile Phones

- **Don't take anything controlled with you**

- **Take a "clean" laptop**

- **Stick to previously published material.**

- **Be aware of what kind of data you receive through your mobile phone.**

- **Retain "effective control" over these items (on your person, in hotel safe, etc. NOT checked baggage.)**

Other Equipment

- It's best to ship material if possible--through third-party carriers to ensure proper compliance with environment, health and safety regulations, export control clearances, and other procedures.

Field Work

- Any university research activity done outside the U.S. may not qualify for the Fundamental Research Exclusion. For example: deploying restricted material in international waters is an export!
- Shipping with intermediate stops can be an export to those countries!

Teaching is a "service"

If you need to take equipment with you contact the ECOs—we can tell you if the export is allowed.

The Message--

- **Export control considerations are complicated.**

- **Contact Export Control early on.**

  —Especially if you need to export data or equipment.

- **MIT has the staff to help you accomplish what you need to do and keep you out of trouble!**

→Let us help you!

exportcontrolhelp@mit.edu

Janet C. Johnston (978 590 0974)
Kate Donovan (617 715 2886)

Export Control Officers

https://research.mit.edu/integrity-and-compliance/export-control