Research Security and Export Control

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Background - Export Control Restrictions

- Due to foreign policy and national security concerns, U.S. government has export control regulations in place. Controls vary by country, institutions, etc. and can restrict what is exported (no export, export w/license, export w/o license). Restrictions can be non-obvious.

- Engagements with colleagues outside the U.S. are subject to export control laws. Everything that crosses the U.S. border is considered an export: Products, equipment, materials, software, technology, information, and "services."*

- "Deemed" export (technology and software): disclosing controlled information to a non-US entity or individual (anywhere in the U.S. or beyond, even on campus).

- However, publicly available information and **results** of fundamental research are generally not covered by export control regulations.

  * Services are broadly defined. Examples include instruction, advice, giving a keynote speech, accepting an award, etc.

Background - Other Important Restrictions

Interactions with certain international entities and persons are restricted

- ***Sanctions by Statute or Executive Order*** Sanctions on a country are intended to punish, coerce, or sometimes target a specific technology area.
  - Comprehensively sanctioned countries: Iran, N. Korea, Syria, Russia-controlled Crimea, Cuba
  - Other countries of concern: Russia, Belarus, Russia-occupied Ukraine areas, and Venezuela (government-connected entities)

- ***Denied/restricted party restrictions*** prohibitions are specific to persons or institutions—Entity and Unverified Lists, SDNs (Specially Designated Nationals), etc.

- ***Entity/Unverified Lists*** restricts listed entities and persons by imposing individual export licensing requirements that are not otherwise in place. Practical impact is that an entity or unverified list entity cannot receive items that others in the same country can without a license being obtained.

We Can Help – Please Contact Us

Why:
- Some institutions (and individuals) are restricted for export control or other risks associated with them. These are not always obvious, but MIT's export control office can help.

When:
- Traveling to a high-risk country (Check [U.S. State Department Travel Advisories](#) and/or the export control office)
- Considering an informal collaboration* with person or entity in high-risk country
- Taking technology (physical item or prototype) with you anywhere out of the country
- Anytime you have concerns or questions

How:
- Contact the [export control office](#)
  - Janet C. Johnston (978 590 0974); Kate Donovan (617 715 2886)
  - **https://research.mit.edu/integrity-and-compliance/export-control**
- Use the Informal International Collaborations tool [https://iic.mit.edu/iic/#/home](#)

*Please note: for formal collaborations where MIT is a signatory to an agreement, assessment of these collaborations is addressed through normal MIT processes

General Travel Advice

Laptops/Mobile Phones

- Don't take anything controlled with you
- Take a "clean" loaner laptop, tablet, phone
- In presenting, 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. Checked baggage is **NOT** deemed to constitute effective control.)

Other Equipment

- It is strongly advised to ship material --through third-party carriers to ensure proper compliance with EHS regulations, export control clearances, liability if items are damaged, and other procedures.
- Shipping with intermediate stops can be an export to those countries!

Field Work

- University research activity done outside the U.S. may not qualify for the Fundamental Research Exclusion. Any physical items or prototype deployed in a foreign country is an export – please contact export control for assistance.

For more details:

https://research.mit.edu/integrity-and-compliance/export-control/scholarly-activities/international-travel