



SAINT LOUIS UNIVERSITY
COMPLIANCE
877-525-KNOW



Export Controls: A Refresher

To protect our national security and promote foreign policy objectives, the federal government restricts the export and transmission of technology, software, and information to foreign persons, countries or entities. Export Control regulations do not just restrict the direct shipment of items to a foreign destination, they regulate the hand carrying of items (laptops, cellphones, flash drives) to foreign destinations, and discussing controlled information with foreign nationals in the U.S. or abroad (“deemed export”).

Regulation:

Export Controls are regulated by three federal agencies:

- The Department of State regulates items that are specifically designed for military applications. *International Traffic in Arms Regulations (ITAR) 22 CFR §§ 120-130*
- The Department of Commerce regulates “Dual-use” items, commercial goods that are predominantly civilian in use but can have a military application. *Export Administration Regulations (EAR) 15 CFR §§ 730-774*
- The Department of the Treasury administers and enforces trade embargoes and economic sanctions. *Office of Foreign Assets Control (OFAC) 31 CFR §§ 500-599*

Exclusions:

The “fundamental research exclusion” allows information to be shared with foreign nationals if it has been previously published and is generally accessible to the public. This exclusion allows the University to teach international students and collaborate with foreign persons and entities on research projects, as long as the information is broadly shared within the scientific community. The fundamental research exclusion only applies to information; once a tangible item is created the project may fall back under Export Control regulations.

Penalties:

The punishments for violating Export Control regulations are severe for both the individual and the University.

- ITAR violations: Up to 2 years in prison and/or \$100,000 fine per violation.

EAR violations: fines up to \$1,000,000 or five times the value of the exports, whichever is greater; or for an individual, imprisonment of up to 10 years and/or a fine of up to \$250,000 per violation.

What steps does SLU take?

- Research proposals and Clinical Trials are reviewed by the University Export Control Officer to determine if the project will need a Technology Control Plan.
- All international travel is reviewed by the Export Control Officer to verify that the location of travel and items taken adhere to federal regulations.
- Foreign visitors and entities that conduct business with SLU are screened to verify that SLU is complying with all government sanctions.

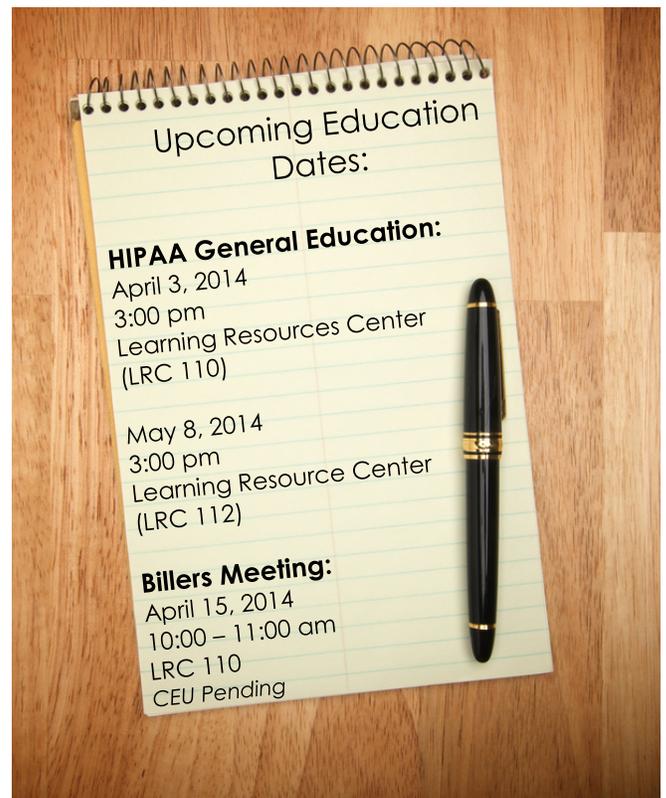
If you have any further questions regarding Export Controls, please contact Michael Reeves, Export Control Officer 977-5880, mreeves8@slu.edu



Tips for Traveling with Technology

Many people will be traveling for Spring break, the majority traveling with technology. Here are a few helpful tips to assist in safely using your devices:

- Secure your laptop or other mobile device with a strong [password](#), OS Security Updates, anti-virus, anti-spyware and firewall software.
- Before you travel, back up your files.
- Do not connect to any unsecured Wi-Fi hotspots; you should only be accessing University/Sensitive Data via VPN.
- If you are travelling internationally, contact the University Export Control Officer, Michael Reeves, 977-5880, mreeves8@slu.edu to ensure compliance with federal regulations.
- If you have additional questions about securing devices, contact infosecurityteam@slu.edu
- If an incident occurs while travelling, immediately contact infosecurityteam@slu.edu



Please feel free to contact the Office of University Compliance at (314) 977-5545 or at slucompliance@slu.edu



If you need to reference past newsletters, upcoming education dates or need more information on Compliance visit our [website](#).