

Export Control International Travel	UMCIRB SOP No.	
	Effective Date	January 2016
	Revisions Date	
	Revision No.	
	Approval: VC REDE	

1.0 Purpose: The purpose of this standard operating procedure (SOP) is to establish guidelines for faculty, staff, and students traveling internationally for ECU business.

2.0 Persons Affected:

2.1 Faculty

2.2 Staff

2.3 Students

3.0 SOP: This SOP establishes responsibilities of faculty, staff, and students when traveling internationally on behalf of ECU. Travel to destinations outside the U.S. may implicate export control regulations. A license may be required depending upon items taken, countries visited, purpose for travel, or whether services will be provided to foreign nationals.

4.0 Definitions:

4.1 Controlled Activity: an activity involving the export of controlled technology or goods or that due to its nature or the parties involved is otherwise subject to export control, embargo or trade sanction requirements under the jurisdiction of the U.S. Department of State, Commerce, Treasury, or any other U.S. government agency with export control responsibilities.

4.2 Controlled Technology: includes any item, component, material, software, source code, object code, or other commodity specifically identified on the Commerce Control List [Part 774 of the Export Administration Regulations (EAR)] or U.S. Munitions List [Part 121 of the International Traffic in Arms Regulations (ITAR)].

4.3 Export Controls: government imposed restrictions and limitations on the dissemination or transfer of controlled technology, goods, and information to foreign nationals and foreign countries.

4.4 Export Control Regulations: includes the EAR, the ITAR; embargoes and trade sanctions administered by the Office of Foreign Assets Control, U.S. Department of Treasury; and any other regulation governing exports that are applicable to University activities.

4.5 Export Denial Lists: lists of individuals and other entities denied U.S. export privileges and include the Denied Parties List, Entity List, Specially Designated Nationals List, Debarred List, and the Unverified List.

4.6 Export Control Officer: Assistant Director in the Office of Research Integrity and Compliance.

4.7 ORIC: Office of Research Integrity and Compliance.

5.0 Procedures:

5.1 Export Control review of travel is required under the following circumstances:

- 5.1.1** Travel to any location of which the U.S. Department of State has issued a Travel Warning;
- 5.1.2** Travel associated with sponsored programs subject to restriction;
- 5.1.3** Travel with university-owned equipment; or
- 5.1.4** Travel to any country subject to a Department of Treasury Sanctions program.

6.0 Responsibilities:

6.1 Faculty, staff, and students traveling internationally on ECU business shall provide the following travel information to ORIC:

- 6.1.1** Destination;
- 6.1.2** Purpose for travel (conference, workshop, etc);
- 6.1.3** Services to be rendered;
- 6.1.4** Presentations given; and
- 6.1.5** Travel with ECU-owned equipment.

6.2 ORIC shall review travel requests to determine:

- 6.2.1** Whether individual or entity restrictions/prohibitions apply; and
- 6.2.2** Whether country specific U.S. sanctions or embargoes are in effect.
- 6.2.3** ORIC shall provide synopsis of compliance requirements, when applicable.

7.0 Revision History:

Date	Revision #	Change	Reference Section(s)