EXPORT CONTROL & EMBARGO UPDATES

Spring 2014

Bloomsburg
California
Cheyney
Clarion
East Stroudsburg
Edinboro
Indiana
Kutztown
Lock Haven
Mansfield
Millersville
Shippensburg
Slippery Rock
West Chester

PASSHE

Pennsylvania State System of Higher Education

ARE YOU PLANNING ON TRAVELING INTERNATIONALLY?

All members of the university community are responsible for understanding if and when export control and embargo laws and regulations may be applicable to international travel. When traveling abroad, any physical material or technical data in your possession is considered by United States regulations to have been "exported" from the United States to your final destination and any intermediate destinations. The regulations, and the laws on which they are based, make it a personal responsibility to abide by the US export laws and embargoes which implement national security, economic, and foreign policy.

To be in compliance with export controls, here are a few items about which you should be aware:

> **Travel to Sanctioned Countries**: Iran, Syria, Cuba, North Korea and Sudan are sanctioned and embargoed countries[1]. Carrying any hardware (including laptop computers or cell phones) and providing or accepting services from sanctioned entities may be a violation of US export laws. Please contact the university administration as soon as possible if you plan to travel to any of these locations.

> **Traveling with hardware**: When traveling to many foreign locations, certain items (including scientific equipment, laptop computers and electronic devices) must remain under "effective control" of the traveler at all times, which is defined in federal regulations as: "retaining physical possession of item or keeping it secured in a place such as a hotel safe, a bonded warehouse, or a locked or guarded exhibition facility". If you need to take university's high-tech devices to foreign locations, it is recommend that you check with the university administration to make sure the device can legally be exported to your destination.

> **Traveling with Technical Data:** Depending on the location and type of data, travelers cannot possess "controlled technical data" defined as "data required for the design, fabrication, operation, or maintenance of military or dual-use technology and, not in the public domain or otherwise exempt from licensing requirements". Generally, this could include any proprietary data. The best advice is to not travel to foreign locations with a computer that contains any proprietary or sensitive data. "Clean computers" may be available from the University for your use when traveling on official business travel.

While the University has a goal of promoting academic freedom and sharing of information to the greatest extent possible, researchers and administrators have an obligation to be mindful of the legal restrictions including the significant personal liability associated with handling sensitive (i.e. controlled) technologies. Please visit the website identified below to learn more and possibly help you determine what action you should take while traveling internationally: https://secure.passhe.edu/asa/exportcontrols/Pages/Export-Controls-Home.aspx.

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[1] "Sanctioned" and "Embargoed" entities are designated by the US Treasury to enforce economic sanctions primarily against countries and groups of individuals, such as terrorists. (http://www.treasury.gov/resource-center/sanctions/Programs/Pages/Programs.aspx).