INTERNATIONAL TRAVEL AND EXPORT CONTROL REGULATIONS

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When traveling abroad, faculty, staff and students at UNL should be familiar with the impact of export control regulations. Researchers need to make sure that any information discussed or items taken out of the U.S. are either not controlled, or if controlled, the proper licenses are in place. Researchers, as individuals can be held liable for improperly transferring controlled technology. Thus, it is important to review and understand that federal requirements are civil and criminal sanctions, with the ability to assess fines and/or invoke prison sentences for individuals violating the export control and embargo laws. These fines or sentencing consequences are substantial and apply to university personnel as well as the University as an institution.

Export control regulations affect:

- Items you take with you on a trip:
    - Laptops (both personal and UNL-owned)
    - Encryption items
    - Data and technology
    - Blueprints, drawings, and schematics
    - Chemicals, biological materials, and scientific equipment
    - Unpublished technical and insight knowledge
- Supplying certain technologies or data at a "closed" conference or meeting (a meeting that is not open to all technically qualified members of the public and attendees are not permitted to take notes)
- Restricted information (in print and electronic format or discussed verbally while abroad)
- Travel to sanctioned or embargoed countries
- Doing business with, or providing services to, certain people or entities (including human subjects and collaborative research)

Fortunately, most international travel does not raise any export control concerns. However, there are denied entities in almost every country. The checklist is designed to provide UNL travelers information on applicable export control regulations they will need to follow based on the nature of their activities while traveling as well as verifying any export control restrictions for your foreign destination.

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Where can you find the International Travel Checklist?

The International Travel Checklist is now available in NUgrant under the Export Control Module. If you have not used NUgrant previously your Blackboard credentials can be used to log in to NUgrant

Who is required to complete the Travel Checklist?

- Faculty, staff and students planning international travel where UNL is paying for any part of your trip to a country with sanctions, embargos or risk alerts.
- Faculty, staff and students traveling with UNL equipment, may need to complete the checklist regardless of destination. Please contact the Export Control office for further guidance on whether a checklist is required for your travel.

Personal Travel - You are **not** required to fill out this checklist for your personal international travel. However, if you are traveling with a UNL laptop please contact the Export Control office to determine if a checklist is required based on your travel destination.

How will you be notified to complete the Travel Checklist?

You will receive an email notification either by the Export Control Coordinator or after you have completed your travel authorization through SAP:
- If you are traveling to a destination that has sanctions, restrictions and/or risk alerts, you will receive an email notification that you are required to complete the Travel Checklist.
- If you are NOT traveling to a destination with export control concerns, you will receive an email notification with general travel information and precautions, along with information regarding other requirements that may apply to your travel.

When do you need to complete the Travel Checklist?

Within five (5) business days of completing your travel authorization through SAP. For special circumstances where international travel is arranged under short notice a checklist should be completed no less than 48 hours from your international flight.

What happens once your Travel Checklist is submitted?

The checklist will be reviewed and approved by the Export Control office. The Export Control Coordinator may contact you to get additional information to complete the export review process.

Questions should be directed to Export Control Coordinator (ECC) Lissette Gilster at 402-472-6929, lgilster2@unl.edu or exportcontrol@unl.edu.

ADDITIONAL INFORMATION THAT MAY PERTAIN TO YOUR INTERNATIONAL TRAVEL
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What is Subject to Export Control: *Materials (print or electronic version) which includes technology, software, and information related to the design, production, testing, maintenance, operation, modification, or use or controlled items, tech equipment, confidential, unpublished, or proprietary information, data or items with current military applications.*

What is Not Subject to Export Control: *Basic marketing information on function   or purpose; information regarding general scientific, mathematical or engineering principles   commonly taught in universities; or information that is generally accessible in the public   domain or which falls under the Fundamental Research Exclusion.*

- *If you are traveling to any of the following countries a license may be required or travel may be prohibited: Cuba, Iran, North Korea, Syria, Sudan, or Libya.*

- *Be aware of the persons, companies, conferences, universities or others that you visit/meet with. Export Control can also be the transfer of knowledge to a person or country's representative.*

- *Presenting information that is not in the public domain or not fundamental research may fall under Export Control regulations. However, discussion of future sponsored programs, allocation of funding, financial data, etc., although not available as public information it is not subject to export control.*

- *If you are attending a closed meeting (not open to all technically qualified members of the public): Please be aware that there are "denied" entities with whom UNL is prohibited from doing business. The Export Control Coordinator can quickly screen these entities prior to your travel to check they are not on any denied list.*

- *If you plan to travel with an electronic device such as a laptop, smartphone, tablet, GPS or other technology software, please be aware that it is important it is only used as a "tool of the trade," to only conduct UNL business (e.g. present at a conference, conduct research projects, teach etc), and that it will be under the "effective control" of UNL personnel while it is abroad. Note: "Effective Control" is defined as retaining physical possession of an item or maintaining it in a secure environment such as a hotel safe or a locked or guarded facility.*

- *It is important to inform the Export Control Coordinator if you plan to share UNL-developed, non-commercial encryption software in source code or object code, not already published via one or more of the following:*
  - *Books, print, electronic or other media available for general distribution to any member of the public*
  - *Libraries open to the public, unrestricted subscriptions, news-stands or bookstores*
  - *Published patents*
  - *Conferences, meetings, seminars or tradeshows in the U.S. that are generally accessible to the public*
  - *Websites available to the public free of charge or at a minimal fee*

- *The Export Control Coordinator has wiped laptops available for your use if you would like to take one in order to ensure no information or technology is accidentally shared while on your trip.*

If you have any questions or think this may apply to your trip, <u>contact the Export Control Coordinator at 402-472-6929</u>.