



## EXPORT CONTROL- EXPORT LICENSE REVIEW AND CERTIFICATION FOR INTERNATIONAL TRAVEL AND/OR SHIPMENTS REFERENCE GUIDE

### Overview

Stanford personnel (Faculty and Staff) may travel or have interactions outside of the United States, for example, to conduct field research and to collaborate with an international partner. Export control regulations may apply specifically when items are hand carried or when items are shipped outside of the United States. In these instances, an Export License Review and Certification for International Travel and/or Shipments is required by Stanford policy.

Export controls apply whenever:

- Tangible items (equipment, components, materials etc.) including laptops and smartphones are being sent or hand carried outside US borders;
- Regulated ("controlled") technical information or software code is being shared with foreign persons or entities in the US or transferred physically, visually or orally to foreign persons abroad;
- When items, information or software are intended for a person or organization identified on a Restricted Party List; or
- Intended for the design, development, production, stockpiling or use of a nuclear explosive device, chemical or biological weapons, or missiles.

When export controls apply, Stanford has the responsibility to either:

1. Obtain an export license through the Dean of Research Office
2. Document an express determination that an exception to export licensing requirements applies
3. Document an express determination that no license is needed

**NOTE:** The University Export Control Officer [[Steve Eisner](#), (650) 724-7072] must be contacted to review and approve ANY export (transmission, shipment, hand carry) of Stanford-owned or controlled property, services or [export controlled information](#) when:

- The export is to Iran, Cuba, Syria, (North) Sudan, North Korea or the Crimea Region of the Ukraine;
- The export involves a [Restricted Party](#) on a US Government export or trade sanctions list;
- The export involves items, information, or software related to International Traffic in Arms Regulations (ITAR) [US Munitions List](#).

### Best Practices

- Employees who travel or have interactions outside of the United States where items are hand



carried and/or shipped as part of their international activity should conduct an export control review and must either:

- 1) Obtain an export license through the Dean of Research Office
  - 2) Document an express determination that an exception to export licensing requirements applies
  - 3) Document an express determination that no license is needed
- Contact the University Export Control Officer [[Steve Eisner](#), (650) 724-7072] for assistance.
  - Refer to the Stanford Export Controls [website](#).

## Roles & Responsibilities

Stanford Originators/Initiators: Faculty and Staff

- ✓ Identify whether tangible items (equipment, components, materials etc.) including laptops and smartphones, software, and information will be hand carried and/or shipped outside US borders.
- ✓ For items which may be hand carried outside the US, review trip reminders and information technology guidelines for international travel- see [https://web.stanford.edu/group/fms/fingate/staff/travel/res\\_jobaid/travel\\_packet.html](https://web.stanford.edu/group/fms/fingate/staff/travel/res_jobaid/travel_packet.html)  
<https://uit.stanford.edu/security/travel>
- ✓ Review Stanford's [Export Controls Decision Tree](#) in order to determine whether or not an export control license is applicable/what type of documentation (certification) is needed.
- ✓ Fill out applicable export control certification form and/or contact the University Export Control Officer [[Steve Eisner](#), (650) 724-7072] for assistance - see <https://doresearch.stanford.edu/research-scholarship/export-controls/forms>
- ✓ Retain soft or hard copies of all export documentation, including financial records, shipping documentation (Commercial Invoices, Shipper's Export Declarations), and appropriate Stanford Certifications in their research project files for a period of five years from the date of the export, reexport or controlled deemed export.

Stanford Approvers/Reviewers: Department Manager and/or designee

- ✓ Perform periodic monitoring and oversight for Export License Review/Certification for International Travel and/or Shipments outside of the United States to ensure the following:
  - Stanford Originators/Initiators roles and responsibilities are performed appropriately.
  - Processes are in compliance with policies & regulations for Export License Review/Certification for International Travel and/or Shipments.

### Penalties for non-compliance:

*Potential financial/other penalties for non-compliance with regulations can be significant; for the University, a fine of up to the greater of \$1,000,000 or five times the value of the exports for each violation and for individuals, a fine of up to \$250,000 or imprisonment for up to twenty years, or both, for each violation.*



## Policies & Regulations

### DoResearch:

DoResearch- Export Controls Overview:

<https://doresearch.stanford.edu/research-scholarship/export-controls/overview>

DoResearch- Export Controls Policy:

<https://doresearch.stanford.edu/policies/research-policy-handbook/export-controls>

DoResearch- Export Controls Decision Tree: <https://doresearch.stanford.edu/node/42878>

DoResearch- Export Controls Review/Certification Forms: <http://doresearch.stanford.edu/node/6166>

DoResearch- Export Controls Record Keeping Requirements:

<https://doresearch.stanford.edu/policies/research-policy-handbook/export-controls/recordkeeping-requirements>

### Other:

Financial Management Systems- Before Your Trip Reminders to Researchers for Compliance with Export Controls: [https://web.stanford.edu/group/fms/fingate/staff/travel/res\\_jobaid/travel\\_packet.html](https://web.stanford.edu/group/fms/fingate/staff/travel/res_jobaid/travel_packet.html)

Information Security- Guidelines for International Travel: <https://uit.stanford.edu/security/travel>

## Questions? Subject Matter Expert (SME) Contacts

DoResearch- <https://doresearch.stanford.edu/>

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## Document History

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<https://acp.stanford.edu/audit/internal-audit-services>

Reviewed by: SME Contacts