Export Controls at Universities

**Level of control**

- **ITAR**
  - (International Traffic in Arms Regulations)
  - United States Munitions List (USML)
    - Controls military items like tanks, bombers and guns
    - Extends to spacecraft and other scientific equipment
  - University Examples: Satellites, guidance systems for sounding rockets, equipment developed under certain DOD grants
  - A license is needed to ship to any foreign country.
  - Foreign persons will likely need a deemed export license to work on ITAR-controlled research.

- **EAR**
  - (Export Administration Regulations)
  - Commerce Control List (CCL)
    - Controls dual-use items (commercial items that COULD have a military purpose)
    - Much longer than USML
    - Not all items controlled for all countries
    - Many exceptions available for licensing
    - Deemed exports (foreign person’s access to controlled information/technology in the US) arise
  - University Examples: Laptops, lasers, semiconductor equipment, select agent pathogens, drones
  - A license may be needed to ship an item. Foreign persons may be able to access items without a license.

- **EAR99**
  - Any item not directly listed on the USML or CCL is considered EAR99
  - University Examples: Pens, MRI scanners, GPS antenna, HIV, circuit breakers, vacuum pumps, certain software, 3D printers, some cameras
  - A license is likely required for:
    - Shipments to Cuba, Iran, North Korea, Sudan or Syria
    - Persons from Cuba, Iran, North Korea, Sudan or Syria gaining access to equipment or technology, though exceptions exist for common items

**Restricted Parties**
- Persons, organizations, businesses, and Universities placed on a restricted party list by the U.S. gov’t with which you should have limited or no interaction

**Fundamental research**
- Basic or applied research in STEM areas at an institute of higher learning the results of which are widely published

**Not Subject to Export Controls**
- Fundamental research
- Anything in the public domain
- Catalog-listed courses

University Examples: See list above

A license is not needed for these activities, even with restricted parties.