Export Controls at Universities

Level of control

ITAR

EAR

EAR99

Not Subject to Export Controls

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.

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