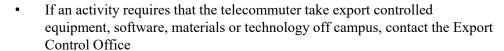# Export Control Guidelines For Telecommuting

What is Telecommuting?

- Telecommuting is when staff members are conducting their work activities away from their normal work location
  - This does not include persons assigned to a non-campus location to fulfill their work responsibilities such as:
    - Physicians or nurses working at a non-campus clinic
    - Persons conducting climate studies in Antarctica
  - Examples of staff telecommuting are:
    - Persons working from home during the pandemic
    - Persons working from a foreign country because travel to the U.S. has been interrupted
- Students taking classes from locations away from their normal classroom or lab setting are telecommuting
  - Examples of students telecommuting are:
    - Students taking on-line classes from their apartment on campus during the pandemic
    - Students taking cataloged courses internationally while visiting family outside of the U.S.

Telecommuting from U.S.

- Typically, activities that are normally conducted on campus, but are now being conducted elsewhere in the U.S. are not an export concern
- Potential concerns:
  - If an activity requires that the telecommuter take export controlled equipment, software, materials or technology off campus, contact the Export Control Office
  - Access to sensitive data (such as HIPAA, FERPA and export controlled information) shall be done through VPN
  - Export controlled information shall not be shared with foreign persons

Telecommuting Internationally

- **Contact the Export Control Office** if staff or students plan to telecommute internationally to determine if an export license is required.
- Transfer of equipment, software, materials or technology internationally may require an export license
  - Any project information should be accessed through VPN
  - Special safeguards may need to be established to protect sensitive data internationally

- **An export license will be required** for a student taking on-line courses from Cuba (graduate courses), Iran, North Korea, Syria and Crimea
- Export controls for telecommuters applies to everyone including U.S. and foreign nationals, regardless of visa status or previous time in the U.S.

Contact the Export Control Office regarding whether you need a license for staff or students