

## International Travel and Export Control Regulations

When traveling abroad, faculty, staff and students at the University of Nebraska at Omaha 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 UNO-owned)
- Encryption items
- Data and technology
- Blueprints, drawings and schematics
- Chemicals, biological materials and scientific equipment
- Unpublished technical insight and knowledge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, travel to most countries often does not raise any export control concerns. However, there are denied entities in almost every country. The checklist below is designed to provide UNO travelers with information on the applicable export control regulations they will need to follow based on the nature of their activities while traveling and verify any export control restriction for your foreign destination.

**University Travel:** Faculty, staff and students (undergraduate and graduate) planning international travel where UNO is paying for any part of your trip or if you are taking any university equipment, will **need to complete an ‘Export Control Travel Checklist’** within five (5) business days of booking air travel. For special circumstances where international travel is arranged under short notice a checklist should be provided no less than 48 hours from your international flight.

The following checklist should be signed and emailed to [bkolobara@unomaha.edu](mailto:bkolobara@unomaha.edu). The Research Compliance Officer may contact you for additional information to complete the export review process.

**Personal Travel:** You are **not** required to fill out this checklist for your personal international travel, **unless** UNO is paying for a portion of your trip or you are taking UNO equipment (laptop, tablet, equipment, etc.).

Questions should be directed to the [Research Compliance Officer](#), Brenda Kolobara, at (402) 554-2702.

# International Travel Check List

Date: \_\_\_\_\_

Name of Traveler: \_\_\_\_\_ Phone: \_\_\_\_\_

Department: \_\_\_\_\_ Email: \_\_\_\_\_

Is your travel linked to a MavGrants research project? Yes \_\_\_\_ No \_\_\_\_

If yes, please provide the MavGrants project or form number: \_\_\_\_\_

Where are you traveling to? \_\_\_\_\_

When are you traveling? \_\_\_\_\_

Will this trip be repeated in this calendar year? Yes \_\_\_\_ No \_\_\_\_

If yes, when are you repeating the travel? \_\_\_\_\_

What is the purpose of your trip? (Check appropriate category)

- Conference, seminar, or meeting
- Research collaboration
- Teaching in a foreign university
- Closed conference or meeting (more information will be required)
- Other: Please provide details: \_\_\_\_\_

What organization or persons (company, conference, university, professor, etc.) will you be visiting during your travel? \_\_\_\_\_

Will you receive compensation for your travel expenses or other compensation from a foreign sponsor or government? Yes \_\_\_\_ No \_\_\_\_

If yes, please specify the amount and the source of your compensation. \_\_\_\_\_

Are you traveling with any of the following items:

- Satellite or space related equipment, components, information technology or software,
- Biological, hazardous materials,
- Hand (physically) carrying any tools or the trade of equipment Information or software to be shared that has current military use or will provide a military service,
- Technology devices (laptop, smartphone, tablets, etc.) with higher than the standard 64 bit encryption.

*Please note that most of the UNO laptop computers will have the standard or market software of 64 bit encryption.*

If yes, please describe the item(s) you are taking on your travel. You may add additional sheets as necessary.

## Other Information

The following information may pertain to your travel. If you have any questions or think this may apply to your trip, contact the [Research Compliance Officer](#) at (402) 554-2702.

## 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 of controlled items, tech equipment, confidential, unpublished, or proprietary information, data or items with 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.

## Other Considerations

- 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, or Sudan. For more information, please see the U.S. Department of the Treasury [Sanctions Programs and Country Information](#) and/or the Department of Commerce [Embargoes and Special Controls \(Part 746\)](#).
- 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 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 UNO is prohibited from doing business. The Research Compliance Officer 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 UNO business (e.g. present at a conference, conduct research projects, teach, etc.), and that it will be under the "effective control" of UNO 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 Research Compliance Officer if you plan to share UNO-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, newsstands or bookstores
  - ✓ Published patents
  - ✓ Conferences, meetings, seminars or tradeshow 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 Information Services Department 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.

**Sign and return**

I hereby certify that I have read and understand the information provided regarding compliance with export laws and regulations. I understand that I could be personally liable if I unlawfully export or disclose export controlled information, or technology to foreign nationals without prior approval. I have provided complete information in responding to the questions listed above.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

CONFIDENTIAL