

THE UNIVERSITY OF ALABAMA IN HUNTSVILLE
INTERNATIONAL TRAVEL AND EXPORT CONTROL COMPLIANCE

Number: 07.04.05

Division: Office of Research Security (ORS)

Date: February 29, 2012

Purpose To inform all University personnel (faculty, staff and students) planning to travel abroad of the need to be compliant with export control laws and regulations.

To inform all University personnel that violations of ITAR and EAR regulations are subject to criminal sanctions including monetary fines or imprisonment of individuals.

To inform all University personnel that taking a laptop and its software (and other “tools of the trade” such as electronic storing devices) outside the US are excluded from U.S. export control regulations under the “Temporary Export Exclusion” if it meets the list of criteria <http://resadmin.uah.edu/RSA/docs/TMPForm.docx>.

Sanitized laptops and/or tablets are available for use during travel outside the US to protect University personnel from non-intentional export control violations.

Policy All University personnel (faculty, staff, visiting scholars and students) planning to travel abroad need to be compliant with export control laws and regulations.

All international travel supported by sponsored or supported programs by the University must be authorized in advance travel.

University personnel requiring access to the sanitized laptop or tablet will be required to complete export training and sign a loan receipt.

Definitions:

Temporary Export Exclusion Criteria's -

The item will be returned to the U.S. within one year of its export date; and

The item is a usual reasonable type of tool of the trade for use in lawful research or education; and

You retain effective control at all times over the item while abroad by retaining physical possession of the item or securing the item in an environment such as a hotel safe; and

- You accompany the item abroad, or the item is shipped within one month before your departure, or at any time after your departure; and
- The item does not contain encryption software employing a key length greater than 80 bits for the symmetric algorithm; and
- The equipment, software and technology are not of an inherently military nature and will not be put to a military use or be used in outer space.

The U.S. Government's Office of Foreign Assets Control (OFAC) -

The U.S. government's Office of Foreign Assets Control ("OFAC") enforces economic and trade sanctions relating to the following countries: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/Programs.aspx>.

The specific regulations on economic transactions conducted with these foreign governments and/or with citizens of these foreign countries differ for each country. If you are traveling to one of these countries, to avoid potential penalties you should carefully review the details of the relevant OFAC sanctions program by clicking on the following link:

<http://www.treas.gov/offices/enforcement/ofac/>

Items of Value -

If you will be carrying a large amount of cash into or out of the United States, be advised that you are required to declare any amount over \$10,000 to U.S. Customs and Border Protection.

Procedures All international travel sponsored or supported by the University must be authorized in advance travel. This authorized travel will be approved through the Office of Sponsored Programs.

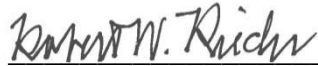
All UAH personnel (faculty, staff, visiting scholars and students) planning to travel abroad need to complete the on line Export Control Training.

All UAH personnel (faculty, staff, visiting scholars and students) planning to travel abroad and take a personal laptop and its software (and other "tools of the trade" such as PDAs and electronic storing devices) must complete the Temporary Export Exclusion Form.

Sanitized laptops and tablets are available to all University personnel for travel outside the US once approval has been granted and training has been completed.

Review The Director of Office of Research Security will be responsible for the review of this policy every four years (or whenever circumstances require).

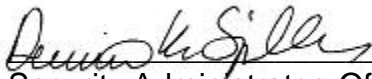
Approval



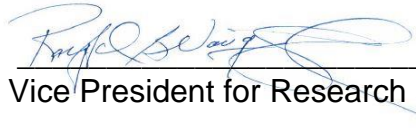
Chief University Counsel



Director Office of Sponsored Programs

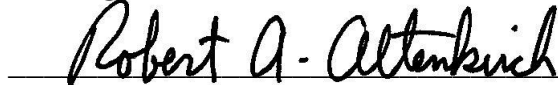


Security Administrator, Office of Research Security



Vice President for Research and Economic Development

APPROVED:



President