

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

Number: 07.04.05

Division: Vice President for Research and Economic Development - Office of Research Security (ORS)

Date: February 29, 2012; Reviewed/Revised November 13, 2023

Purpose To inform The University of Alabama in Huntsville (“UAH” or “University”) faculty, staff, and students (collectively “UAH personnel”) planning to travel abroad of the need to be compliant with export control laws and regulations.

Policy All UAH personnel planning to travel abroad must be compliant with export control laws and regulations.

UAH personnel that violate International Traffic in Arms Regulations (ITAR) and Export Administration Regulations (EAR) are subject to criminal sanctions including monetary fines or imprisonment of individuals.

All UAH personnel that are 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 found on: <https://www.uah.edu/ors/travel-safety>. All UAH personnel planning to travel abroad and take a personal laptop and its software (and other “tools of the trade” such as electronic storing devices) must complete the Temporary Export Exclusion Form.

All UAH personnel must complete Export Control training or be current on training.

All international travel, sponsored or supported by the University, must be authorized prior to travel. All **sponsored** travel will be approved through the Office of Sponsored Programs (OSP). If the University supports the travel through other funding, it must be approved through the proper departmental channels.

In order to protect UAH personnel from non-intentional export control violations, sanitized laptops are available for use during travel outside the U.S. once approval has been granted and training has been completed. All personnel requiring access to a sanitized laptop will be required to sign a loan receipt.

Definitions:

Temporary Export Exclusion Criteria -

- 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: <https://ofac.treasury.gov/sanctions-programs-and-country-information>.

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.

Review

The ORS Director will be responsible for the review of this policy every five years (or whenever circumstances require).