Export Control Compliance

“Protecting MIT's open research policy and the free interchange of information among scholars while complying with U.S. Export Control Law”

Janet C. Johnston
Export Control Officer

Nicole Levidow
Compliance Administrator

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MIT Export Control Resources

Janet Johnston, MIT Export Control Officer

- BS - MIT Physics
- BS - MIT Earth and Planetary Sciences
- MS - MIT Earth and Planetary Sciences
- MS - MIT Civil Engineering
  - Air Force Research Laboratory
  - Pentagon
  - Air Force European Office of Aerospace Research & Development
  - AF Foreign Military Sales
  - Private Pilot

Contact Information
jcjohnst@mit.edu
(617) 253-2762

Nicole Levidow, Compliance Administrator

- Juris Doctor, Emory University
- Master of Science in Public Health, Emory University

Contact Information
nlevidow@mit.edu
(617) 253-0460

ExportControlHelp@MIT.EDU
http://osp.mit.edu/compliance/export-control
New CINTI training module for MIT Export Control: https://osp.mit.edu/compliance/export-control/training
Research

When submitting a proposal at MIT, every PI must answer these questions:

– Will you receive material not publically available?
– Will any part of the project be conducted outside of the US?
– Will you be sending material outside the US?
– Does the sponsor documentation refer to restrictions on publishing or participation?
– Does the sponsor intend to limit participation in the research by researcher nationality?
– Does the research project involve visits/access to any national labs or outside facility that has foreign national restrictions?

This presentation will explain why the answers are important.
Drivers: Faculty, Students, and Staff

- Faculty
- Students
- Staff

Research and Educational Activities

Information flow

- OSP Contract Specialists
- Office of Risk Management
- Others

Export Control

Direct Route OK

Export Control Officer
Answers you’ll have by the end of this talk

Part I--Background

1. Role of Export Control Officer
2. What is the difference between “classified” and “export controlled?”
3. What’s an “Export?”
4. What’s a “Service?”
5. What kinds of things are controlled and what is their effect on MIT?
6. Who says material is controlled? How do the regs differ?
7. More specifically...What determines which exports are prohibited?
8. What is the “US?”
9. What is the definition of a “US person?”

Part II—How Can an Open University Function?

10. What is the fundamental research exclusion? How is Fundamental Research defined by State and Commerce? And why is that important?
11. Hot Buttons--sensitive technologies
12. Considerations when Collaborating, Conducting research, offering courses or professional programs on-line or at MIT, holding workshops, and teaching abroad
13. Advice for International Travel
14. International Teaching and Conferences
15. How to Comply?
16. Scary part!
Campus vs. Lincoln Laboratory

**MIT Lincoln Lab**
- Federally-funded R&D center
- Restricted
- US employees
- Export-controlled & classified research

**MIT campus**
- University
- Open
- International students, scholars, faculty
- Education and fundamental research
Export Control in a Nutshell

• 3 Kinds of considerations:
  ✓ Technology restrictions
  ✓ Country Restrictions
  ✓ People and entity restrictions

• Exports can be illegal because of:
  ✓ What it is
  ✓ What country it’s going to
  ✓ The recipient (individual and Institution) (US or out of country)
  ✓ End use!
  ✓ Suspicion of third-party transfer

• Other --service
1. Role of Export Control Officer

Requirement:
Must obey the law

Task:
Operate an open university within the framework of the law
2. “Classified” vs. Export Controlled

• Classified... Unclassified, Confidential, Secret, Top Secret... Consult your security officer...need security clearance for secret and above. Established under Executive Order 13526

• Export controlled – State Dept, Commerce, DOE, NRC, Homeland Security... You do not need a security clearance. “US Persons” can have

• “Confidential” – meaning can vary. Usually means company proprietary info or PII, Privacy Act etc.
• CUI – Controlled, Unclassified Information (Federal contracts)
3. What’s an Export?

• Export
   Everything that crosses the border is an export...
   ...even if it's temporary
   ...even if it wasn't sold
   ...even if it will be used for research
   ...even if the item was made in that country

• “Deemed” Export
   Disclosing controlled information to non-US entity or individual — even in the US, even on campus
   – ITAR: license for all non-US (some exceptions)
   – EAR: License required some nationalities
   Includes access to ITAR items by foreign persons
   Only refers to technology and software

10% undergrads
40% grad students
65% post-doc fellows
42% faculty
are foreign born at MIT
4. What’s a (Defense) Service?

• Assisting a non-US person in developing an ITAR item
  - Includes design, development, engineering, manufacture, production, assembly, testing, repair, maintenance, modification, operation, demilitarization, destruction, processing, use
• Requires a license
  – Transfer of public domain information can be a defense service

Examples

- Teaching a foreign national to use IR camera
- Selecting key academic papers and sending to a colleague in Russia
- Answering questions during Q&A at an overseas conference
- Serving on an advisory board of a foreign university
- Inviting a speaker to a conference MIT is hosting

A service does not need to involve ITAR to be illegal. Assisting individuals normally resident in sanctioned countries or on a denied parties list can be an illegal service. Even inviting a speaker from a sanctioned country to a conference you are organizing can be a prohibited “service.”
5. What’s Export Controlled?

- Products
- **Equipment** required to make controlled products
- **Materials** required to make controlled products
- **Software** required to develop, produce, or use products
- **Information** required to develop, produce, or use products

- Your **laptop** and other personal electronic devices
- **Information** stored in your laptop and in other devices—and in your **brain**

**International travel = export**
Everything that crosses the border is an export:
Even if it’s temporary, even if it is not sold, even if it will be used in research, even if it belonged to someone in that country to begin with.
Export Control Regulations Affect MIT Multi-dimensionally...

Research
- Research with International Students or Faculty
- Research using export controlled material
- Sponsored Research
- Technology Licensing
- International Collaborations
- We end up as sub-contractors with flow-down stipulations.

Teaching
- Online Courses
- Professional and Executive Education
- Teaching International Students at MIT and Teaching Abroad
- International Conference Presentations
- We hold workshops abroad and domestically

Material
- We send things abroad
- We buy things
- We send information abroad
- We receive information/equipment
- We borrow equipment from outside institutions/companies

Other
- SMART, Hong Kong, Skoltech, TLO, MASDAR, ILP...

Many MIT people are not U.S. citizens/green card holders.
6. Who determines what is export controlled?

- **Department of State**: ITAR: USML (Defense items)
- **Department of Commerce (Bureau of Industry and Security)**: EAR: CCL (Dual-use) *(most MIT campus items)*
- **Nuclear Regulatory Commission**: 10 CFR 110.8 and 110.9: Nuclear items, equipment and material
- **Department of Energy**: 10 CFR 810: Foreign Nuclear Assistance and export of unclassified nuclear technology
- **Department of the Treasury OFAC**: Sanctions programs (Cuba, Crimea, Iran, N. Korea, Syria...)
- **Homeland Security**: Protected Critical Infrastructure Information (PCII)
How do the regulations differ?

- **Sanctions** on a country are usually to punish, coerce, or sometimes target a specific tech area.
- **Export Restrictions** (e.g., ITAR, EAR, DOE) are to prevent potentially dangerous material from getting into the wrong hands.
- **Denied/restricted parties** are specific to persons or institutions/entities.
7. More Specifically...

MIT mostly deals with:
- State Department
- Commerce Department
- Department of Energy
- Treasury
State Dept – ITAR (Intl. Traffic in Arms Regs.)

Think “weapons/military”

• US Munitions List
  – Weapons, ammunition, explosives, propellants
  – Chemical, biological, toxicological agents
  – Some spacecraft, satellites
  – Missiles, torpedoes, bombs, mines
  – Aircraft, ships & submersibles, tanks
  – Fire control, guidance and control equipment
  – Military electronics
  – Protective personnel equipment
• Materials and components
• Technical data (including software)
• Services
Think “Dual Use”

• Commerce Control List (700 pages)
  – Nuclear (redirect -> ITAR, NRC, DoE)
  – Aerospace, propulsion, avionics
  – Some spacecraft and satellites
  – Marine
  – Navigation
  – Electronics, computers
  – Telecommunications, information security
  – Sensors and lasers
  – Materials, chemicals, microorganisms and toxins

• Components, materials
• Equipment (develop, produce)
• Software
• Technology

Most of MIT’s stuff falls here

If not enumerated on the CCL (or other lists) → EAR99
EAR99 may not be sent to an embargoed country, for a prohibited end use, or to a prohibited end user!
EAR CCL ECCN will determine legal destinations

**Categories**
- Category 0 - Nuclear Materials, Facilities & Equipment (and Miscellaneous Items)
- Category 1 - Materials, Chemicals, “Microorganisms”, and Toxins
- Category 2 - Materials Processing
- Category 3 - Electronics
- Category 4 - Computers
- Category 5 (Part 1) - Telecommunications
- Category 5 (Part 2) - Information Security
- Category 6 - Sensors and Lasers
- Category 7 - Navigation and Avionics
- Category 8 - Marine
- Category 9 - **Aerospace and Propulsion**

**Product groups**
- A Systems, Equipment and Components
- B Test, Inspection and Production Equipment
- C Material
- D Software
- E Technology

**Example:**
3C005 Gallium Nitride substrate
DOE Controls

Department of Energy’s 10 CFR §810 regulations

• Activities in scope
• Activities not in the scope
• Generally authorized activities

Appendix A to Part 810 - Generally Authorized Destinations
Restricted Party Lists

Restricted Parties
• No dealings with individuals or institutions on Restricted Party List
• Must obtain a license to transact

Many lists: AECA Debarred Parties, Denied Persons List, Entity List, Unverified Specially Designated Nationals and Blocked Persons ...

Third-Party Transfers
• You are held responsible if you even hold a suspicion that materials to be exported to an allowable destination may be transferred to a prohibited third party destination

All international sponsors and collaborators (people and institutions) should be checked against Restricted Parties list!

Sanctioned countries: Iran, Crimea area, Cuba, (Sudan), Syria, N. Korea, Russia, China....)

*Note EAR99 may not be sent to an embargoed country, for a prohibited end use, or to a prohibited end user!
Export license needed?

• ITAR: when items or technical data leave the US
  —Almost always

• EAR: when items, equipment, material, software or technology leave the US*
  —Depends on classification, destination, end use and user

  Examples
  ✓ Samples for a foreign lab
  ✓ Lending equipment to a foreign lab
  ✓ Sharing sponsor/vendor information
  ✓ Traveling outside the US

- Sanctions or Restricted parties – License always needed

* US territories count as US.
8. What is the United States? (per EAR)

Unless otherwise stated:

- the 50 States, including offshore areas within their jurisdiction pursuant to section 3 of the Submerged Lands Act (43 U.S.C. 1311),
- the District of Columbia,
- Puerto Rico
- All territories, dependencies, and possessions of the United States, including foreign trade zones
- established pursuant to 19 U.S.C. 81A-81U
- the outer continental shelf, as defined in section 2(a) of the Outer Continental Shelf Lands Act (43 U.S.C. 1331(a))
9. US Persons and Foreign Nationals

**EAR US Person**

Any individual who is:

- a citizen of the United States
- a permanent resident alien of the United States
- or a protected individual as defined by 8 U.S.C. 1324b(a)(3)

“Foreign person” is synonymous with “foreign national,” as used in the EAR, and “foreign person” as used in the International Traffic in Arms Regulations (22 CFR 120.16).

**DOE defines foreign nation the same as ITAR/EAR:**

“an individual who is not a citizen or national of the United States, but excludes U.S. lawful permanent residents and protected individuals under the Immigration and Naturalization Act (8 U.S.C. 1324b(a)(3))”

**However, for determining Foreign National Access to DOE Sites**

A foreign national is defined as any person who

- was born outside the jurisdiction of the United States
- is a citizen of a foreign government
- has not been naturalized under U.S. law
Access to ITAR (US Person) and EAR

Employee Exemption

- Bona fide, full-time regular employee, authorized to work full-time in the US under a non-immigrant visa
  - Not: grad students, F-1 students, Fellows, part-time work visas
  - DOES include Postdoctoral Associates
- Permanent abode in US for period of employment
- Not from proscribed country: Afghanistan, Belarus, Burma, Central African Republic, China, Cyprus, Democratic Republic of Congo, Cote d’Ivoire, Cuba, Eritrea, (Fiji), Haiti, Iran, Iraq, Kyrgyzstan, Lebanon, Liberia, Libya, North Korea, Russia, Somalia, Sri Lanka, Sudan, Syria, Venezuela, Vietnam, and Zimbabwe (ITAR 126.1)
  - [http://www.pmddtc.state.gov/embargoed_countries/index.html](http://www.pmddtc.state.gov/embargoed_countries/index.html)
- Must be notified (use MIT export control NDA form)

Access to EAR is very similar to the ITAR exclusion for bona fide employees
Don't Expect Logic!

- Transportation to the ISS is not an export
- Deploying in international waters is an export
- Antarctica
  -- export is to nationality of individual recipient according to ITAR
  -- export to nation in control of the location is EAR
    -- way points in shipping can constitute an export!

- US Person--citizenship
  -- ITAR considers all past and multiple citizenships
  -- EAR only current citizenship
  If dual citizenship, EAR considers last one obtained to be the nationality

- Borrowed items
  -- Even if the item belongs to a foreign institution, you may not be allowed to return it to them. The item may be restricted -- which means YOU can't export it to them
Lack of Logic (con’t.)

**Products of Fundamental Research**
- Research results and software technically do not have any ECCN
- But it is possible to make a controlled item from FR
- But once an item is manufactured by a vendor can loose the FR protection and become export controlled

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**Example:** Iranian student designs circuit board at MIT. → FR
S/He sends to a manufacturer who **adds** some minimal design to it.

It now is restricted under the EAR regulations to Iran

→ Designer cannot have access to his/her own circuit board which s/he designed!

*It is possible to make a Defense Item*
How can an open university function?
10. Fundamental Research Exclusion

Regulations contain exclusions for university education and research:

- ITAR, EAR, and (DOE) 10 CFR 810 exclude education and fundamental research (details vary)
- ITAR, EAR, and 10 CFR 810 exclude publicly available information
- ITAR excludes public domain information

Normal catalog courses taught on campus are excluded from controls.

--Also, foreign persons may be able to utilize restricted items in their research as long as they do not learn how to: operate, install, perform maintenance, repair, overhaul and refurbish. (some wiggle room there)
MIT Accepts Only Fundamental Research

Fundamental research and its results are exempt.

- Comply — by creating research results that are not controlled

- Core fundamental research requirements
  - No restrictions on publication
  - No restrictions on participation

Sounds easy enough…
Fundamental Research

• EAR and ITAR exclude fundamental research from control
  – ITAR: must be conducted at a US institution of higher learning
    (watch out for collaborations and visits to other countries, research can lose its FR umbrella!)
  – EAR: fundamental research can be conducted anywhere

• But some encryption technology does not qualify as fundamental

OSP review of sponsored research keeps campus research fundamental
Products of Fundamental Research

• While research results developed or generated under the **Fundamental Research Exclusion** are exempt from export controls and can be freely shared with foreign nationals both here and abroad, any materials, items, **technology**, or software generated as a result of the research **ARE NOT** exempt from export controls. S/W is usually considered EAR99

• So tangible items resulting from fundamental research (prototypes, materials, some encryption software, etc.) are not automatically excluded
Definition of Technology and Technical Data

Note differences between EAR and ITAR:

Think “Know-How”

• Technical Data (ITAR):
  Information, other than software as defined in §120.10(a)(4), which is required for the design, development, production, manufacture, assembly, operation, repair, testing, maintenance or modification of defense articles. This includes information in the form of blueprints, drawings, photographs, plans, instructions or documentation. (See part 120.10 of the ITAR)

• Technology (EAR):
  Information necessary for the “development,” “production,” “use,” operation, installation, maintenance, repair, overhaul, or refurbishing (or other terms specified in ECCNs on the CCL that control “technology”) of an item.
“Use” – if everything has an ECCN, how can we function day-to-day?

• Under the EAR a foreign person can have access to and manipulate/operate/utilize EAR controlled items even if the item in question is controlled for export to the individual’s home country.

• However, for a "deemed export," a license is needed before releasing Technology to a foreign person in the US if a license would be required to send the same Technology their home country.

• A release can occur through a demonstration, oral briefing or provision of documents.
What technologies are considered "fundamental research"?

"Fundamental research" means research in science, engineering, or mathematics, the results of which ordinarily are published and shared broadly within the research community, and for which the researchers have not accepted restrictions for proprietary or national security reasons.

- It is distinguished from proprietary research and from industrial development, design, production, and product utilizations, the results of which ordinarily are restricted for proprietary and/or specific national security reasons.

- Normally, the results of "fundamental research" are published in scientific literature, thus making it publicly available. Research which is intended for publication, whether it is ever accepted by scientific journals or not, is considered to be "fundamental research."

- A large segment of academic research is considered "fundamental research." Because any information, technological or otherwise, that is published is not subject to the Export Administration Regulations (EAR) (except for encryption object code and source code) and thus does not require a license, "fundamental research" is not subject to the EAR and does not require a license. Please see §734.8 for a full discussion.
11. Sensitive Technologies and Other Hot Areas

- Space
- Quantum Computing
- 3-D Printing
- Encryption
- IR Sensors
- Nuclear
Satellites and ITAR

• EAR until 1999
• Moved to ITAR by Congress in 1999
• Satellites and spacecraft > EAR November, 2014
• Most space captured under ECCN 9A515
12. Considerations

• US Person--citizenship
  --ITAR considers all past and multiple citizenships
  --EAR only current citizenship
  If dual citizenship, EAR considers last one obtained to be the nationality
Defending against restricted inputs

• Research agreements, Non-Disclosure Agreements, Material Transfer Agreements
  – No transfer of export-controlled items or technology (except EAR99*) without MIT agreement to receive
  – Technology Control Plan (Open Access policy exception) may be required

• Procurement
  – Procurement personnel well-trained in export control – alert ECO when MIT researchers try to purchase restricted items.
  – Checks restricted parties list for vendor status

*Note EAR99 may not be sent to an embargoed country, for a prohibited end use, or to a prohibited end user!

Comprehensively-embargoed countries include: Iran, Cuba, Crimea area
Terrorist states include: Iran, North Korea, Syria, (Sudan)
Shipping

- eShipGlobal--Phased implementation, initiated late 2015
- Explicitly queries shipper re export control status of parcels--needs ECCN
- International shipments are seen and approved by ECO, recipients are checked against restricted parties list

- If not using Eship yet, contact ECO before shipping internationally
13. International Travel

- ITAR-controlled items or technical data (including software) cannot be taken out of the country without a license from the State Department.

- EAR-controlled items can be taken using TMP or BAG* exceptions — must be brought back to the US in a year.

- US persons can take EAR technology but cannot transfer it if a license required.

- US Customs can inspect or retain your personal electronic device without probable cause.

- Your unattended laptop may be searched in some countries.

**ECO advice to travelers:**

- Don’t take anything controlled with you.

- Take a “clean” laptop.

*BIS has defined “effective control” as: You maintain effective control over an item when you either retain physical possession of the item, or secure the item in such an environment as a hotel safe, a bonded warehouse, or a locked or guarded exhibition facility. Retention of effective control over an item is a condition of certain temporary exports and reexports.
International Travel

Activities:

• Some activities are prohibited, especially in OFAC sanctioned countries (check General Licenses/sanctions to see if what you intend to do is legal)

• Activities falling under the university fundamental research exemption are not exempt outside of the US

Field Work:

• Any university research activity done outside the U.S. may not qualify for the Fundamental Research Exclusion. For ex. –deploying restricted material in international waters is an export! Balloon flight –recovery?

• Shipping with intermediate stops can be an export to that country!

Teaching is a “service”

Note that shipping to a foreign country = hand carrying/luggage || EXPORT!
14. International Teaching

Things change when you leave the US university environment...

- Teaching abroad is not sheltered by the exemption for normal catalog courses taught in a US university!
- Must run names of students through restricted party screening
- Must not teach OFAC sanctioned country nationals (Cuba, Iran, Crimea...)
- Is considered a “Service”
Conference Sponsorship

• If MIT (any DLC) is hosting, sponsoring, etc an overseas or domestic conference, workshop, contact ECO *before* inviting speakers

• It is considered a “Service” and if invitees are on sanctions list or restricted party lists → violation of US law

• Best if symposium open to all generally interested and qualified scientific community!

If presenting at a conference – only published or intended to be published material
### Multiple Facets – How we do it

- **Assure research qualifies as fundamental**
- **Minimize incoming restricted material**
- **Develop TCPs**
- **Research agreements, Non-Disclosure Agreements, Material Transfer Agreements...**
- **Educate MIT community**

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Policy is to comply fully with USG regulations (ITAR, EAR, 10 CFR 810...) while maintaining MIT’s open access policy through regulations' provision for university education and fundamental research.

We don’t want to export restricted material without a proper license; we don’t want to receive restricted material without prior notification and our approval!
Exception to MIT’s Open Research Policy

• Only allow restricted material on Campus if the controlled items are absolutely critical to the research with no alternatives

• Develop and implement a practical and effective Technology Control Plan

• RI responsible to train TCP personnel to follow plan

• Status of TCP reviewed annually by ECO

Being permitted to receive restricted material on Campus is a privilege!

→ ~36 Active TCPs on campus, ~50/50 EAR/ITAR
16. Penalties and Prosecutions
Penalties and Prosecutions Increasing!

Recent Trends: OFAC (Sanctions)

- 2011: 21 actions / $92M
- 2012: 16 actions / $1.14B
- 2013: 27 actions / $137M
- 2014: 23 actions / $1.2B
- 2015: 15 actions / $600M

AECA

- 1 August 2016: penalty provisions of the Arms Export Control Act (AECA) (22 U.S.C. 2751 et seq.), which authorizes the International Traffic in Arms Regulations (ITAR)., civil monetary penalties capped at **US$500,000 per violation** of the controls on the temporary import and export of defense articles and defense services increased to **US$1,094,010 per ITAR violation**.
Actions

Settlement With American University Of Beirut, Resolving Claims It Provided Material Support To Three Entities Designated Prohibited Parties Under U.S. Law-

AUB, a teaching-centered research university located in Beirut, Lebanon... violated the federal False Claims Act (the “FCA”) by providing material support to three entities that had been included on the U.S. Office of Foreign Assets Control’s (“OFAC”) Specially Designated Nationals and Blocked Persons Service....UAB required to pay $700,000 fine

UMass Lowell Exported EAR99 atmospheric sensing device to Pakistan (NLR); But partner is Pakistan’s Space and Upper Atmosphere Research Commission (“SUPARCO”) —on US Commerce Department’s Entity List

No license --&gt; $100,000 or greater fine

UTenn Knoxville, J. Reece Roth (MIT ’59), Professor EECS,. Research subcontract, Flow-down Requirement:

Air Force (ITAR Data) → Atmospheric Glow Technologies → University Tennessee; Non-US Graduate Research Assistants (China, Iran) → Unauthorized transfers of ITAR technical data →

Defense service—4 year prison sentence!
Ahmadinejad Photo Op in Iranian Nuclear Enrichment Plant – export controlled MKS Pressure Transducers clearly visible in photos traced to sales by New England Company.
The Chinese Smuggler and the Iran Deal

A Chinese national is imprisoned for supplying U.S.-origin items to Iran’s nuclear program (from The Diplomat, 21 March 2016)

• On February 1, 2016, Sihai Cheng was sentenced to nine years in prison after pleading guilty to six charges related to the diversion of U.S.-manufactured pressure transducers to Iran. Cheng had apparently been procuring goods on behalf of Iranian entities for a number of years when his Iranian contact asked if he could procure pressure transducers made by MKS, a company in Andover, Massachusetts.

• Pressure transducers are a specialist item necessary in most uranium enrichment processes – including centrifuge enrichment. The items are manufactured by fewer than 10 firms worldwide and they are thus seen as a “chokepoint technology” whose adequate control can prevent clandestine uranium enrichment from taking place.

• There was substantial benefit to Iran’s program, which has been prohibited by UN sanctions from receiving such goods for much of the last decade. The collective effect of the actions of the individuals was that more than 1000 US-origin pressure transducers were diverted to Iran!
U.S. Nuclear Engineer Pleads Guilty to Violating the Atomic Energy Act (Jan 2017)

• Szuhsiuang Ho, 66, naturalized U.S. citizen, pleaded guilty to conspiracy to unlawfully engage or participate in the production or development of special nuclear material outside the U.S., without the required authorization from the U.S. Department of Energy (DOE) in violation of the Atomic Energy Act.

• Ho worked with US-based nuclear experts to provide technical assistance to China

• Ho faced a maximum sentence of 10 years in prison and a maximum $250,000 fine.

Taiwanese-American Ho received two years in prison followed by one year of supervised release and a $20,000 fine for his violation (Plea-dealt to avoid espionage charge)
Summary

• Remember Exports can be illegal because of:
  - What it is
  - What country it’s going to
  - The recipient (individual and Institution) (US or out of country)
  - End use!
  - Suspicion of third-party transfer

Beware of providing unauthorized “services”

• If your work involves:
  - International contact
  - International travel (you → there or they → here)
  - Receiving or transferring restricted material
  - Restricted participation
  - Restrictions on publication

Contact the ECO!
Remember:

MIT is a fundamental research only institution.

Having access to restricted material on a TCP makes you responsible for handling that material in accordance with the TCP, CMPs, US law, etc.

Export Control violations are very serious. Let us help you avoid them.
Questions?

Janet C. Johnston
Export Control Officer
jcjohnst@mit.edu
617 253 2762

Nicole Levidow
Compliance Associate
nlevidow@mit.edu
617 253 0460

exportcontrolhelp@mit.edu

http://osp.mit.edu/compliance/export-controls
Pause for table discussions
Top Ten EC Questions I don’t want to hear

10. You mean I’m “legally” (financial/criminal) responsible for this piece of export controlled equipment?

9. I’m done with the project. Can’t I just store the restricted software on my laptop at home?

8. Oh, I had to inform you if we changed the TCP (procedures/personnel/disposition of restricted material)?

7. My colleague in country X can’t get the manual to (equipment Y). Can I just mail it to him/her?

6. Room for yours...

5. Oh, you mean my technology control plan responsible individual duties don’t end if I leave my department/lab/center? I was supposed to tell you, to transfer responsibility?

4. Oh, I was supposed to tell you if I received a piece of restricted equipment on loan from a company or another institution?

3. If I can’t give $ directly to an OFAC-sanctioned country, can I just give it to another foreign partner and tell them to give it to the restricted country researcher as an honorarium?

2. How do I ship dry ice?

---And the number one, top thing not to tell your ECO is:

“Oh, I can’t ship it to country X? I’ll just hand carry it in my luggage.”