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

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Subject: When to Screen Individuals and Entities

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Background: U. S. export control regulations, sanctions and executive orders limit our interactions with some individuals and entities (universities, companies, foundations, etc.). Further, many entities are listed on the China Defence Universities Tracker, or "Unitracker"), a database of Chinese institutions understood to be engaged in military or security-related science and technology research. Unitracker was created by the Australian Strategic Policy Institute's (ASPI's) International Cyber Policy Centre, and has been supported by funding from the US Department of State's Global Engagement Center. The level of risk presented by a listed institution is ranked as low, medium, high and very high. "Risk" refers here to the evaluation of institutions for their military links, security links or known connection to human rights abuses or espionage. US government officials have stated that the list should be given attention by universities.

MIT has a campus-wide license to a tool known as Visual Compliance. Visual Compliance checks for presence on various lists of concern, including the Unitracker. It takes only a few seconds to run a check. You can register to do it yourself (https://research.mit.edu/integrity-and-compliance/export-control/restricted-party-screening) or the Export Control Office (ECO) can do it for you. (exportcontrolhelp@mit.edu)

Additionally, you may be contacted by a **Foreign Government Talent Recruitment Program**. There are no official lists of these entities; however, they have certain characteristics that raise alarms. To recognize a "Talent" program, see https://research.mit.edu/sites/research/files/uploads/mit-export-control-guidance-foreign-talents-2019-12-19.pdf.

If you suspect or are concerned that an entity you are interacting with might be such a program contact the Export Control Office (exportcontrolhelp@mit.edu).

Also, new endeavours involving China, Saudi Arabia or Russia must be reviewed by the International Coordinating Committee for possible elevation to the Senior Risk Group for review. If your project is being processed by RAS, they will submit it for review, if not contact the ECO.

When to screen:

People

- Before entering into a collaboration, whether official OR informal.
- Before accepting or inviting visitors to MIT. Also scan visitors' home institutions.
- Before exporting any material, including printed material.
- Before "inviting" a speaker (or guest?) to a conference sponsored in whole or part by MIT.
- Before accepting learners into courses not associated with an MIT degree (workshops, on-line courses, on-campus professional education, etc.). You must also exclude learners ordinarily resident in comprehensively sanctions countries (currently Iran, Syria, North Korea, Cuba, and Crimea area).

Entities

Many entities change their names. Search on or provide to the ECO any former names if you know these. Take this action:

- Before entering into a collaboration, official OR informal.
- Before accepting or inviting any visitor from the entity to MIT.
- Before exporting any material to the entity (and check with ECO if the export is allowed to that country).
- Before planning a visit to the entity.

Note that presence on one of these lists doesn't necessarily prohibit your fundamental research plans, but you should consult the Export Control Office to avoid violating any restrictions in place. Also, the restricted lists are dynamic. People and entities go on and off the lists from time to time, so if your interaction is continuing you may wish to rescreen periodically. The ECO staff will be happy to advise you, provide training on the screening tool, or direct you to any other relevant offices at MIT.