



TEXAS A&M UNIVERSITY SAN ANTONIO

Export Control Considerations for International Travel

A&M- San Antonio encourages and supports its faculty, staff, and students to participate in university-related activities abroad, including international research. International travel on behalf of A&M-SA may be subject to export control regulations due to the technology, software, and/or technical data being taken out of the country, and/or due to the travel destination. The following should be considered when planning international travel and/or research collaborations to ensure compliance with export control laws and regulations.

Where are you traveling?

If traveling to Cuba, Iran, North Korea, Russia, Syria, or Crimea, Donetsk or Luhansk regions of Ukraine please contact the Export Control Officer immediately. Activities and items that you can take into these countries may be highly restricted, as may any services provided to nationals of these countries and may require an export license.

Other countries with notable sanctions and end-user restrictions include Balkans, Belarus, Burma (Myanmar), Central African Republic, China, Democratic Republic of the Congo, Ethiopia, Hong Kong, Iraq, Lebanon, Libya, Venezuela, Yemen, and Zimbabwe. Layovers in foreign countries also count as a destination for export control purposes. Please be aware that restrictions may exist for a layover location, even though it is not your destination.

Why are you going?

Foreign conferences – limit presentations, seminars, and discussion to topics that are not related to export-controlled items, software, or technology unless that information has been published, is currently publicly available or in the public domain, or qualifies as fundamental research. Do not provide details of your research or area of expertise to anyone who is not known to you.

Please note: if you are planning to **travel to Iran for a meeting or conference, you will need to obtain an export license** even if the material is not controlled prior to your trip. Contact the

Export Control Officer immediately to allow time to apply for a license.

The Export Controls Officer will require information about the dates of your stay, location of your stay, your hosts, and an invitation letter to complete the screening. Please submit these via concur or via email form.

Conducting Research or Meeting with Collaborators – sharing information or conducting research on export-controlled items or technology will likely require an export license.

Providing Defense Services – Furnishing assistance to foreign persons in the design, development, engineering, manufacture, production, assembly, testing, repair, maintenance, modification, operation, demilitarization, destruction, processing, or use of defense articles requires an export license.

Who are you meeting?

The U.S. government maintains lists of restricted, denied, debarred, designated, or blocked individuals and entities. If named on one of these lists, A&M- SA may be prohibited from doing business with or providing services to the individual or entity. Please contact the Export Control Officer to ensure that any individual or entity you will be collaborating with overseas is not on a restricted party list.

What are you taking with you/shipping?

Do not travel with any of the following items without first obtaining specific advice from the Export Control Program, as these items may require an export license:

- Devices, systems, or software that are not standard, off-the-shelf products generally available to the public.
- Devices, systems, or software that are specifically designed or modified for military or space applications.
- Data or information received under an obligation of confidentiality.
- Data or analyses that result from a project that has restrictions on the dissemination of the research results.
- Classified information
- Export controlled information

Technology is information required for the development, production, use and maintenance of controlled items. This may include blueprints, drawings, designs, photos, plans and/or instructions. Please consider these items when determining whether you are planning to bring controlled technology out of the U.S.

Items That You May be Able to Take with You

A “Tools of the Trade” license exception may be available to A&M- SA personnel who plan to travel temporarily out of the U.S. and hand carry certain types of hardware, software and/or data, provided that the terms of the license exception are met. This exception does not apply to items, technology, data, or software regulated by the International Traffic in Arms Regulations (ITAR). You must obtain a loaner laptop for use when you are abroad.

Please contact the Export Control Officer if you would like more information on this or other less frequently used travel exceptions when traveling internationally.

Items That Need to Be Properly Secured for Travel

If you are traveling with any export-controlled information or other sensitive data on your devices, you must encrypt your devices to protect the data from unauthorized disclosure. Please remember that before you travel with any data or devices, make sure that these items can be exported out of the country and taken with you to your intended destination. Encryption software that is not commercially available on a mass market basis may be regulated or restricted from being brought into some countries. Please contact A&M-SA’s Office of Information Technology for more specifics on securing your data and devices. The Export Controls Officer will also provide you with a laptop handout which includes the process for obtaining a loaner laptop.

Training

A&M- SA offers several training programs for international travel as required by the Systems Office. Beginning August 1, 2024, all staff and faculty members must complete the following training annually.

Train Traq course 2111212: Export Controls & Embargo Training- Basic

If you are travelling abroad for personal or official reasons, please ensure that you have taken the following International Travel training courses within the last year prior to your scheduled departure date.

2111728: International Travel Safety: Safe Passages Presentation

This presentation provides safety and awareness education for Texas A&M System employees and students while traveling overseas.

2113639: U.S. Foreign Corrupt Practices Act

This course provides an overview of the U.S. Foreign Corrupt Practice Act for Texas A&M System employees and students while traveling overseas.

For Texas A&M System Employees:

Log on to SSO: <https://sso.tamus.edu/>

Go to TrainTraq and search for the above courses in the ‘Course Catalog’ tab.

If you are traveling with any export-controlled information or other sensitive data on your devices, you must encrypt your devices to protect the data from unauthorized disclosure. Contact IT for more information regarding hand-carrying electronic devices. Please remember that all required training and approvals must be obtained in writing **prior** to your trip.

A&M- SA’s Export Control Officer shall assist in evaluating export control concerns to reduce the likelihood of an export control or sanction violation.

How to get Export Control Clearance for your travel-

If you are traveling internationally for professional reasons, submit the following information for screening via the form <https://tamusa.jotform.com/240644099349061>

- Invitation letter

- Dates of your visit
- Name of the country
- List entities you will visit.
- List individuals you will visit. Please give names of your host.
- Are you travelling to another country from there?
- Will your expenses be paid by a foreign source?
- Will you export equipment, items, or specimens?
- Is all information to be shared at the meeting available in the public domain?
- Do you intend to access project materials while abroad?
- Will you take your institution issued laptop or technology?
- Will you travel with other employees or students? If yes, list their names
- Will you take items that is considered proprietary or needs under a Technology Control Plan?

Foreign travel involving expenditure of institutional funds requires approval at various levels and must be routed via concur.

It is best practice to notify the export controls officer if you plan to go on a personal visit to international locations. A simple email with the destination and dates of visit will be sufficient.

For all questions regarding International travel, contact-

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