

## International Travel

When traveling abroad there are three basic questions that university personnel need to consider when determining if export controls apply to their travel:

### Where are you going?

In general, travel to most countries is not a problem with the exception of Cuba. In almost all cases, travel to Cuba requires a license from the Treasury Department. The Treasury Department has issued a general license that does allow travel to Cuba for some research activities and/or for attendance at an international conference under certain conditions. If your travel plans include transit to or through Cuba, contact the Office of Research for assistance in determining if your travel qualifies under the general license.

When traveling abroad it is always a good idea to contact the appropriate U.S. Embassy or Consulate before you depart to let them know where you will be going. For additional information, see U.S. Embassies and Consular Offices, and Registering with Embassies.

### What are you taking with you?

**Items & Equipment** – When taking items abroad (including scientific equipment, computers, cell phones, and GPS units) you need to verify that the items are not export restricted based on your travel destination(s). For most low-tech, commercially-obtained items, an export license will **NOT** be required unless you are traveling to or through a comprehensively sanctioned country (i.e., Cuba, Iran, Syria, Sudan, and North Korea) in which case an export license will almost certainly be required – **even for everyday items such as cell phones and laptop computers**. Contact the Office of Research for help in determining your export license requirements.

It is highly recommended that you register any items/equipment that you will be taking with you with U.S. Customs and Protection (CBP). Registration allows you to prove that you had the items before you left the U.S. and all CBP registered items will be allowed to return to the U.S. duty-free. For additional information see Columbus CBP – Port of Entry and Registering Items with CBP.

For some international destinations you may be able to obtain an ATA Carnet to facilitate the temporary import of items. Currently there are 70 countries participating in the ATA Carnet program. Using an ATA Carnet eliminates having to pay value-added taxes (VAT), duties, and/or the need to post import security bonds. For additional information, see Using an ATA Carnet.

**Research Data & Information** – When traveling abroad, you are free to take and openly share or discuss any data or information resulting from Fundamental Research or that qualifies under the Educational or Public Information Exclusions. However, you **cannot** take or share data or information that is in any way export-restricted (e.g., related to export controlled technologies, proprietary information, or is information resulting from a project not protected under the

Fundamental Research Exclusion). All controlled or restricted data or information should be completely removed from laptops, phones, PDAs, or other portable storage devices (e.g., flash drives) before you leave the U.S.

### **What will you be doing and who will you be interacting with?**

It is important to ensure that you do not accidentally export restricted information or provide any type of assistance or benefit to a sanctioned or blocked entity. The following are a few things to keep in mind as you plan your travel activities:

**Presentations** – When presenting data/information in an international setting (including in the U.S. where the audience may include foreign nationals), you need to ensure that you limit your presentation to only information or data that is published, or is publicly available, or that qualifies as Fundamental Research. Be careful not to include or discuss any proprietary, unpublished, or export-restricted data or information as that may constitute an unauthorized export.

**Interactions with Foreign Colleagues** – As noted above, you are free to openly discuss any published or publicly available information or information generated as the result of Fundamental Research as long as the recipient is not a sanctioned or specially designated entity. It is important to remember that while the results/information resulting from Fundamental Research are not subject to export controls and can be shared without a license, any items, technology, or software generated under that Fundamental Research **would be** subject to export controls and may require an export license.

**Field Work** – Any university research activity done outside the U.S. may not qualify for the Fundamental Research Exclusion and would therefore not be protected from export controls until the work is published or otherwise made publicly available. Before disclosing or sharing information or data resulting from international field work it is important to ensure that the information is not export restricted.

**Provision of Financial Assistance** – In order to ensure compliance with OFAC regulations prohibiting the university from providing material or financial assistance to any blocked or sanctioned individual or entity, any university activity that involves payment to a non-U.S. person, business, or organization (e.g., international subcontracts, purchase of items from international vendors, or payments to research participants) must be verified against all appropriate sanctioned party and entity lists. Contact the Office of Research for help in verifying any international financial transaction(s).

IF THIS INFORMATION APPLIES TO YOUR INTERNATIONAL TRAVEL, SEE SENIOR COORDINATOR MARK LYNAM IN DERRYBERRY HALL 129, PHONE: 931-372-3673, OR EMAIL: [research@tntech.edu](mailto:research@tntech.edu).