



Policy Title:	Export Control
Policy Number:	ACAD- 131
Revision Date:	February 2022
Policies Superseded:	ACAD-306
Policy Management Area(s):	Research

## **SUMMARY:**

United States law limits the export of certain technologies, including both actual equipment and knowledge about the equipment and processes. The list of technologies extends beyond the obvious military items and can include seemingly innocuous items such as laptop computers. The list of restricted destinations also extends beyond the obvious countries and includes transfer of knowledge to individuals from certain countries that may actually be in the U.S. on legitimate visas.

All institutions of higher education and their faculty, staff and students must comply with these laws. In case of violation, criminal sanctions (including substantial fines and even prison terms) can be applied.

## **POLICY:**

- I. Coastal Carolina University is committed to fully complying with all U.S. laws and regulations. Each employee is expected to support this commitment and is responsible for being aware of his or her obligations and addressing them in a prompt and proactive manner.
- II. Under no circumstance should the export of controlled commodities or information take place contrary to U.S. export control regulations. Sponsorship of University operations/functions by any agency of the U.S. federal government does not mitigate, supersede or remove the University's responsibility to adhere to U.S. export control laws.
- III. While export regulations affect many activities at the University, the following is a non-exhaustive list of situations that could trigger export control regulations:
  - A. Shipping tangible items internationally;
  - B. Sharing proprietary, confidential or otherwise restricted information or software code with foreign nationals at Coastal Carolina University;
  - C. Sharing proprietary, confidential or otherwise restricted information or software

- code with a destination outside the U.S.;
  - D. Interactions with countries or organizations/individuals from a country currently subject to sanctions or an embargo;
  - E. Hand-carrying laptops, cell phones containing certain microprocessors, and other equipment while traveling to foreign destinations; and
  - F. Exporting or importing an item that has been designed, developed, configured, adapted or modified for a military application.
- IV. In export situations, Coastal Carolina University has a responsibility to either:
1. Obtain an export license and document the process properly; or
  2. Determine that no export license is required and document this determination properly; or
  3. Determine that while an export license is required, an exception to that requirement exists and document this determination.
- V. Coastal Carolina University will assist any member of the community in complying with export control laws, including pursuing licenses from U.S. government agencies where appropriate. Inquiries for export control related matters should be directed to the Office of Sponsored Programs and Research Services (OSPRS).
- VI. Each employee is responsible for understanding the export control requirements related to his or her work and ensuring that no exports are made contrary to U.S. export control regulations. These regulations have significant ramifications for travel; research transfers of material, equipment, or information; purchasing; surplus property; and contracting.
- A. For more information about U.S. export control regulations, go to <https://www.trade.gov/us-export-regulations-0>.
  - B. The Office of Foreign Assets Control ("OFAC") of the US Department of the Treasury administers and enforces economic and trade sanctions. For more information, go to <https://home.treasury.gov/policy-issues/office-of-foreign-assets-control-sanctions-programs-and-information>.