



High-Risk International Travel & Export Control Compliance

ORED - Office of Research
Compliance and Integrity

Why Export Controls Matter

- LSU supports open and collaborative research.
- Federal export control laws restrict certain transfers of technology, software, equipment, and technical data.
- International travel can create export control risks.
- Compliance protects researchers, LSU, and U.S. national security interests.

PM 45 - Compliance with Export Control Regulations

<https://lsu.edu/administration/policies/permanentmemoranda.php>

PS 119 - Compliance with Export Control Regulations

<https://lsu.edu/policies/>

What is an Export?

Export = More Than Shipping Equipment

An export may include:

- Shipping controlled items overseas.
- Sending controlled information electronically.
- Discussing controlled technology with foreign nationals.
- Providing visual access to controlled technical data.
- Using controlled technology for the benefit of a foreign person or entity.

Key Point: A conversation, presentation, laptop, or cloud access can constitute an export.

Regulations Governing International Travel

Federal Export Control Framework

EAR (Export Administration Regulations - Department of Commerce)

- Controls certain goods, software, and technology.

ITAR (International Traffic in Arms Regulations - Department of State)

- Controls defense articles, defense services, and related technical data.

OFAC (Office of Foreign Assets Control - Department of Treasury)

- Administers sanctions and embargoes against certain countries, entities, and individuals.

Noncompliance can result in civil, criminal, and administrative penalties.



Why High-Risk Travel Requires Special Review

Foreign Adversary & High-Risk Destinations

Travel to high-risk countries may involve:

- Increased scrutiny of research activities.
- Restricted technology transfers.
- Sanctions and licensing requirements.
- Cybersecurity and intellectual property concerns.
- Potential exposure of sensitive information.

Early review is essential.



What Researchers Should Evaluate Before Travel

Four Critical Questions:

- Will you take or access-controlled technology, software, or technical data?
- Are you traveling to a sanctioned, embargoed, or high-risk destination?
- Are you transporting biological materials?
- Are you carrying specialized equipment, encryption software, or other controlled items?

Important Research Exclusions

Common Exclusions

Researchers may rely on exclusions for:

- Published information and publicly available software.
- Educational information taught in university courses.
- Fundamental research intended for broad publication and dissemination.

Remember:

- Exclusions do not automatically apply to physical items carried abroad.
- Proprietary, government-controlled, or company-controlled information may still require authorization.

Travel Planning & Licensing

Plan Ahead:

- Some travel may require EAR, ITAR, or OFAC licenses.
- Multiple licenses may be required for a single trip.
- Approval timelines can range from weeks to months.
- Export reviews should occur well before travel dates.

Do not assume approval can be obtained quickly.

Key Takeaways

Export Control Compliance Is Everyone's Responsibility

- International travel can create export control obligations.
- High-risk destinations require enhanced review.
- Protect controlled information, technology, and equipment.
- Consult LSU Research Compliance early.
- When in doubt, contact the Export Control Officer before travel.

Bottom Line

- High-risk international travel is both a travel matter and a compliance matter.