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# **Need to Know Information for International Travel**

Northwestern students, faculty, and staff traveling internationally on behalf of Northwestern for academic, research or other purposes need to follow a series of steps. The Offices of Global Safety and Security and Export Control & International Compliance have collaborated to provide this guidance document to the Northwestern community.

# 1. Visit the <u>Office of Global Safety and Security</u> website and the <u>Export Controls & International</u> <u>Compliance Travel Guidance.</u>

The Office of Global Safety and Security (OGSS) supports Northwestern travelers abroad – students (graduate and undergraduate), faculty and staff. Post-pandemic, Northwestern launched an <u>International Travel Registry</u>, where all non-study abroad <u>students</u> must disclose their University-sponsored travel at least two weeks prior to departure. (Study abroad students' travel details are automatically transferred to the registry 30 days prior to the start of their program). Trip leaders are also required to register their travel when taking students abroad.

**Register Travel to OFAC-sanctioned countries:** In addition, employees (faculty and staff regardless of citizenship) are highly encouraged to <u>register their official travel</u> to comprehensively sanctioned countries. The <u>Office of Foreign Assets Control</u> (OFAC) of the U.S. Department of the Treasury administers and enforces economic and trade sanctions based on U.S. foreign policy and national security goals. OFAC issues both civil and criminal penalties for non-compliance. While comprehensively sanctioned countries change over time, currently they are Belarus, Cuba, Iran, North Korea, Russia, Syria, and certain Regions of Ukraine. The Export Controls & International Compliance (ECIC) <u>website</u> maintains an up-to-date list of sanctioned countries.

The Travel Registry provides important pre-departure health and safety resources and monitors travelers' destinations during their trips, which allows OGSS to reach out and offer support in a timely manner in the event of a serious threat to travelers' health or safety, such as a natural disaster or a terror attack.

Some locations considered higher risk require additional disclosures. See the "disclosures" section on OGSS's <u>evacuation</u> page. Additionally, OGSS recommends that you check the relevant State Department <u>Travel Advisory</u> for general safety information.

**Contact number if you experience issues at the U.S. Port of Entry:** If you experience issues at the U.S. port of entry, you can contact the Northwestern non-emergency line: (847) 491-3456.

## 2. Determine what equipment, materials, data, or software you plan to take.

The U.S. government has export restrictions on certain items. Consult <u>with Export Controls & International</u> <u>Compliance</u> (ECIC) to determine if your equipment, materials, data, or software are subject to these restrictions. If restrictions apply, the <u>ECIC</u> team can provide guidance on appropriate next steps, such as applying for an export license.

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Traveling with a "<u>clean" laptop is recommended.</u> A "clean" laptop does not include proprietary or sensitive information, including unpublished information that might be subject to confidentiality restrictions. Contact your department IT team or <u>NUIT for assistance</u>.

## 3. Complete the international travel exemption forms prior to your travel.

International travelers should complete the Temporary (TMP) license exception when hand-carrying items abroad for <u>University business</u>. Relevant items include, but are not limited to, laptops and other electronic devices (smartphones, tablets, etc.), equipment, software, and technology. The TMP exception form is used for University-owned items when traveling on University business. Note some items may need an export control license rather than the TMP exemption so please plan accordingly and reach out to the <u>ECIC</u> for assistance. For example, if you are carrying substances or materials (e.g., biologics, chemicals, etc.), high levels of encryption, or space-related technology, please contact the <u>ECIC</u> for an export control review.

• **TMP Form** "University" equipment\*

## 4. Determine if you are traveling to a sanctioned country.

Depending on your destination(s), authorization from the U.S. Treasury's Office of Foreign Assets Control (OFAC) may be required. Travel to an embargoed/sanctioned country (such as Iran and Cuba) may require prior authorization in the form of a license. No University equipment should be taken without prior approval and no University business should be conducted without prior authorization. Most activities involving heavily sanctioned countries (even remotely) will require a license. The most highly sanctioned countries or areas change over time but currently include Cuba, Iran, North Korea, Russia, Syria, and Crimea, Donetsk and Luhansk. Contact the <u>ECIC</u> for assistance.

## 5. Determine if you are traveling to a military end-use country.

Depending on your destination, the U.S. Commerce Department's requirement for authorization to "export" even basic equipment (such as laptops, cell phones, etc.) may apply if the country is a designated military-end user. The designated <u>countries change</u> over time (currently Belarus, Burma, Cambodia, China, Russia and Venezuela). Contact the <u>ECIC</u> for assistance.

## 6. Confirm with whom will you collaborate, associate, or do business with on your travels.

Before travel, foreign parties may be screened using the Restricted Party Screenings tool to avoid collaborating with a prohibited party. The <u>ECIC</u> team can assist with conducting screenings.

## 7. Take steps to safeguard your research.

The research at Northwestern is innovative and often of high value even if it is not subject to export control restrictions. The following steps can help you protect your research and fulfill your compliance obligations:

- Use University processes (Buffett, COI, INVO, Sponsored Research, etc.) to engage with collaborators
  – avoid side deals;
- Complete and update federal agency and Northwestern disclosures;



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- Limit what you take abroad;
- Keep information in your possession or locked in a secure location;
- Use the Northwestern VPN (where allowed; some countries ban the use of VPN software);
- Encrypt your device; and
- Ask questions. The ECIC and OGSS teams are here to assist you.

Additionally, to assist researchers in navigating international partnerships and avoiding inadvertent issues, the Office for Research maintains a <u>webpage</u> with guidance on Improper Foreign Interference.

If you are receiving federal funding, affiliations with talent programs must be disclosed. Individuals receiving federal funding cannot be "malign" foreign talent recruitment program members. Here is a link to definitions of foreign talent recruitment programs and <u>malign talent program</u>.

If you have any questions, please contact the

Export Controls & International Compliance

or

**Office of Global Safety & Security** 

Please also report anything that gives you pause from your trip.

## Other resources:

- Office of the Director of National Intelligence. "<u>Know the Risk Raise Your Shield: Travel Awareness</u> <u>Video.</u>
- The National Counterintelligence and Security Center. "<u>Traveling Overseas with Mobile Phones</u>, <u>Laptops</u>, and <u>Other Electronic Devices</u>."