

Why might I need to think about export controls when international visitors want to tour my lab?

 Although people often think of an export as the sending or shipping a physical item (known as an "actual export"), U.S. export control regulations also apply to what are known as "deemed exports": the transfer of information or data to a foreign person within the U.S. is deemed to be an export to that person's home country. Lab tours where foreign visitors can view details of export-controlled research is an example of a deemed export and could implicate export control considerations.

Are there certain restricted entities or individuals that I should prohibit from visiting my lab?

 Yes. The government maintains certain sanctions and other trade restrictions against lists of individuals, entities, and organizations that have violated U.S. export control laws, have participated in proliferation activities, or have been determined to be terrorists, terrorist organizations affiliated with certain sanctioned governments, and for other reasons. The most significant of these are OFAC's lists of sanctioned entities and individuals.

OCEC maintains a screening tool allowing for prompt identification of any sanctions or export controls that may apply to a given entity or individual. Please reach out to OCEC with any questions about whether a particular individual or entity may be subject to restrictions.

My lab contains sensitive information and technologies. Does this mean I should not allow any international visitors?

- Not necessarily. However, there are some best practices for international visits to labs that might contain sensitive information or technologies, including:
 - Contact OCEC for assistance determining whether a particular individual or entity may be subject to restrictions.
 - Ensure that no confidential or proprietary information is visible at the time of the visit.
 - Do not permit visitors to insert thumb drives or other media into USC-owned computers.
 - Ensure that visitors are escorted throughout the tour.
- If you anticipate hosting international visitors to a lab that contains sensitive information and technologies, please reach out to OCEC for an export controls review.

I conduct only fundamental research in my lab. Do I still need to take precautions when hosting foreign visitors or giving a lab tour?

• Export control laws do not apply to "fundamental research" projects, defined as basic and applied research, the results of which are ordinarily published and disseminated broadly without restrictions (such as sponsor-imposed pre-publication review requirements or nationality-based participation restrictions).

Even when individuals and affiliated institutions are not on restricted party lists and there are no apparent export control issues, it is nevertheless good practice to refrain from sharing information and results not yet public, or IP not yet protected, with general visitors.

I'd like to learn more about international travel and export controls. Where can I find additional information?

• Additional information about restricted research, export control compliance and restricted party screenings can be found on the OCEC website <u>Research and Export Controls</u> page. You can also view USC's <u>International Collaborations and Export Controls policy</u>. For questions, please contact Emily Pender, Manager of Export Controls, at <u>epender@usc.edu</u>.

