Projects Requiring an Export Review

An OSP Export Specialist must review projects subject to the following conditions:

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<th>Review required at PROPOSAL stage</th>
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<td>(required PRIOR to proposal submission)</td>
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When the sponsor is foreign . . . **YES**
Submission of deliverables to a foreign sponsor could be considered an export of U.S. technology.

When using a foreign subcontractor or consultant . . . **YES**
Sharing of research materials with a collaborating institution could be considered an export of U.S. technology.

| Review required at AWARD stage |

When an agreement contains certain non-standard language . . . **YES**
This may include non-standard export, publication, or confidentiality language – or the agreement includes key words that may trigger an export review (examples may include “sensitive, classified, results of work are confidential, U.S. citizens only, must comply with NISPOM, etc.”)

When a foreign collaborator is involved . . . **YES**
A denied party screening of any foreign collaborators will need to be performed.

When the project involves any interaction with an embargoed country . . . **YES**
It is illegal to perform any service for an embargoed country or with certain individuals associated with such countries. A complete list of embargoed countries and applicable sanctions can be found here: [http://www.treas.gov/offices/enforcement/ofac/programs/index.shtml](http://www.treas.gov/offices/enforcement/ofac/programs/index.shtml)

When shipping anything abroad . . . **YES**
Even some very basic U.S. software (pre-installed on most computers purchased in the U.S.) and equipment are restricted for export.

When traveling abroad to conduct research . . . **YES**
Some common research equipment, including GPS units, may be controlled for export.

When traveling abroad to conduct training . . . **YES**
Training of foreign nationals can be considered a “defense service,” and may be controlled for export.

When traveling abroad to attend a conference . . . **YES**
There may be controls on an investigator’s personal belongings, such as a laptop, but presenting a paper at a conference abroad is generally not considered an export, unless the project is classified or subject to access or dissemination restrictions.

When hosting foreign visiting scientists or scholars . . . **YES**
Training of foreign nationals (not enrolled or employed by Penn State) can be considered a “defense service,” and may be controlled for export.

When employing foreign graduate students, research associates, and postdocs . . . **NO**
Foreign PSU students and foreign PSU employees are permitted to work on research projects, unless the project is classified or subject to access or dissemination restrictions.