Projects Requiring an Export Review

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

**Review required at PROPOSAL stage**

**(required PRIOR to proposal submission)**

When the sponsor is foreign . . . **NO**

*A batch screening of all existing SIMS Sponsors was completed on June 12, 2015. All new sponsors are screened prior to being added to the SIMS database. Therefore, a separate review at proposal stage is not necessary.*

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>

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. Update: Effective 1/4/2016, export reviews of foreign travel will be conducted centrally by the UECO - however OSP still needs to have an export log created until changes to the IAF system are in effect.*

When traveling abroad to conduct training . . . **YES**

*Training of foreign nationals can be considered a “defense service,” and may be controlled for export. Update: Effective 1/4/2016, export reviews of foreign travel will be conducted centrally by the UECO - however OSP still needs to have an export log created until changes to the IAF system are in effect.*

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. Update: Effective 1/4/2016, export reviews of foreign travel will be conducted centrally by the UECO - however OSP still needs to have an export log created until changes to the IAF system are in effect.*

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.*