



**Office of the Vice Provost for Research
Office of Research Security, Integrity, and Compliance**

**International Travel and Engagement:
Compliance with U.S. Export Control and Sanctions Law**

International travel and engagement is critical to the work of Boston College and also requires members of the BC community to ensure compliance with U.S. export control and sanctions law. While it is always important to consider export control and sanctions obligations, this becomes particularly important when the country involved is subject to heightened U.S. export controls or sanctions. Members of the BC community should be aware of the possible implications of their international travel and engagement, and contact the Office of Research Security, Integrity, and Compliance (RSIC) with questions about export controls or sanctions.

International Travel - International travel, whether for BC business or personal in nature (including visits home to a foreign country), can raise export control and sanctions concerns.

- Electronic devices and scientific equipment, including standard-issue BC devices, can be controlled for export to many locations, and particularly those subject to sanctions or heightened export controls. Any information stored or accessed on a device while abroad is considered an export to the country in which the device is located. During international travel, electronics are subject to search and seizure by U.S. and foreign governments, and data could be compromised during travel, resulting in access by competitors.
- Travel frequently results in collaboration and engagement that could be restricted.
- Travelers should become familiar with the Boston College International Travel Policy, including the required use of the [Travel Registry](#) for BC-related international travel.

International Collaboration and Engagement - Collaboration occurs in many forms, including but not limited to official cooperation agreements, co-authorship, and seeking advice/sharing work with colleagues (whether or not a physical transfer of information/material occurs). Collaboration is integral to the work of BC, is highly encouraged, and requires members of the BC community to comply with export control and sanctions law.

- **Exports** - Contact with foreign nationals or foreign institutions can result in the export of information/technology, which could be restricted under U.S. export law. Sharing research, technology, or technical information with colleagues located abroad, by any means, and in some cases foreign nationals located in the U.S., may constitute an export and/or require a license. All physical shipments require completion of an [International Shipping Form](#) and clearance by RSIC, prior to sending.
- **Services** - The “provision of services” to individuals, entities, or countries subject to U.S. sanctions may be prohibited or restricted without a license. The U.S. government interprets this very broadly, and therefore it is important that members of the BC community contact RSIC prior to initiating any activity that involves a sanctioned country, individual, or entity, e.g., virtually attending/teaching a class from a sanctioned country, participating in a conference hosted by a sanctioned country, or seeking advice from an individual located in a sanctioned country.
- **Financial Transactions** - Financial transactions involving sanctioned countries or entities may also be restricted. Contact RSIC prior to initiating any financial transactions involving a sanctioned country or individual/entity from a sanctioned country.