

DREXEL EXPORT CONTROL COMPLIANCE POLICY STATEMENT

Drexel University (Drexel) engages in research and educational activities that may involve the development or use of products, goods, hardware, software or materials (collectively, “items”) or technology that may be subject to U.S. export control laws and regulations. The U.S. government increasingly is focused on the compliance of non-profit research institutes and universities with these laws and regulations. Drexel is committed to complying with all applicable export controls, as established by the federal regulations described below. As a result of the severe criminal and civil penalties for noncompliance by Drexel and by individual researchers at Drexel, it is critical that everyone in the Drexel community understands these rules and complies with them fully. Violations also can put at risk Drexel's research and international activities and the research and international activities of its Principal Investigators which could lead to the loss of research funding.

Export control rules are highly complex. The export control regulations and lists maintained by the U.S. Department of Commerce (EAR); the U.S. Department of State (ITAR), and the U.S. Department of the Treasury (OFAC) change frequently and are subject to agency interpretation. In general, export control regulations apply to:

- the transfer, or “export” of specified items or technology (e.g., products, materials, or software) outside the United States;
- the disclosure of certain information to certain foreign persons inside the United States (“deemed export”);
- the training or offering of services involving controlled equipment or information to foreign persons;
- the design or production of items related to defense services;
- transactions with, or providing services to, certain foreign countries, organizations or persons who are on embargo or restricted lists;

In order to assist you in recognizing situations that should be carefully reviewed to determine whether export controls apply, we have designed a [Drexel's Export Control Handbook \[PDF\]](#) to help guide you. In addition, we will continue appropriate education and training programs on an on-going basis.

If, upon using the Handbook, you identify a situation requiring further review, or you believe an export license or other approval may be required, please contact Export Compliance (comp.export@drexel.edu) as soon as possible.

The export control regulations have become more prominent, and scrutiny concerning the level of compliance by non-profit research institutes and universities with these regulations continues to increase. It is very important that faculty and other researchers throughout Drexel understand their obligations under these regulations and adhere to them strictly.