

Export Control Guidance

It is the [policy](#) of the George Washington University to comply with U.S. export control laws. Export control laws restrict certain types of information, technologies and commodities that can be transmitted overseas to entities and individuals, including U.S. citizens, or made available to foreign nationals on U.S. soil.

This guidance defines exports, helps researchers comply with export control laws and GW policy, and provides contact information for researchers if university activities trigger an export control review.

Definition of Export: Generally, an export means: (1) An actual shipment or transmission of items controlled under the EAR or ITAR out of the U.S.; (2) any written, oral or visual release or disclosure of controlled technology, information or software to a foreign person either in the U.S. or outside the U.S.; or (3) any actual use or application of controlled technology on behalf of or for the benefit of any foreign entity or person anywhere.

Controlled = subject to and regulated by the U.S. government and export control laws.

Information Security Policy: Any University computing system, equipment, or network that is used by Authorized Users to store, process, or transmit university Non-Public Information must be secured in a manner that is consistent with contractual or legal restrictions and is reasonable and appropriate for the level of sensitivity, value, and risk that the information has to the university or members of the university community. Please refer to the [policy](#) for more information.

Export Control Triggers:

- Restrictions on publication such as sponsor publication approval rights or prepublication reviews.
- The following restrictions: participation of foreign nationals; persons or entities based on country of nationality; access to project information or government facilities by non-US persons; the hiring of non-US persons.
- Confidentiality restrictions including non-disclosure agreements or requirements to keep information confidential.
- Sponsor to retain resulting research information as proprietary/trade secrets.
- Transfer or storage of export controlled data or information. **(EAR or ITAR-controlled data and research records must be maintained on GW servers or locally on individual machines owned, controlled, and maintained by the University).**
- Request for proposals (RFP) or award documents with restrictive labels including “Export Controlled” or “ITAR or EAR Controlled.”
- Administrative, physical, and technical safeguards in data transfer and use agreements.

For additional information on export controls please visit the [Export Control](#) website or contact the Office of Research Integrity at resinteg@gwu.edu.