Export Compliance Resources for Academic Institutions

Vetting Resources

Consolidated Screening List Search

This page allows users to search various U.S. Government screening lists, including the Bureau of Industry and Security's (BIS) Entity List and the Department of the Treasury Office of Foreign Assets Control's Specially Designated Nationals (SDN) List, by filling in specific fields, such as name, address, country, and source.

NCSC Safeguarding Science Toolkit

The U.S. Government's National Counterintelligence and Security Center's (NCSC) Safeguarding Science initiative is an outreach program designed to protect research and innovation in emerging technologies. It aims to raise awareness about potential risks involving these technologies, such as potential misuse or theft, and help stakeholders secure technology in the fields of AI, bioeconomy, autonomous systems, quantum computing, and semiconductors.

The China Defence Universities Tracker

The Australian Strategic Policy Institute's China Defence Universities Tracker is a tool that identifies Chinese universities that are engaged in defense research, training defense scientists, collaborating with the military, cooperating with defense industry conglomerates, and are involved in classified research.

Named Research Organizations

The Named Research Organizations list is composed of research organizations and institutions that pose the highest risk to Canada's national security due to their direct or indirect connections with military, national defense, and state security entities. Under the Government of Canada's Policy on Sensitive Technology Research and Affiliations of Concern, all researchers involved in activities funded by a research grant from the Government of Canada that advance a sensitive technology research area must terminate affiliations with, or receipt of funding or in-kind support from, these entities to continue with the research grant.

Trade Integrity Project

The Trade Integrity Project (TIP), an initiative of the UK-based Open-Source Centre, has launched a website that monitors military and dual-use trade with Russia. The TIP website specifically focuses on trade in Common High Priority List (CHPL) items and displays entities that have shipped CHPL items to Russia since 2023, according to publicly available trade data. BIS, in cooperation with the European Union, Japan, and the United Kingdom, has developed the CHPL, which currently includes 50 items identified by six-digit Harmonized System Codes that Russia seeks to procure for its weapons programs. The list of CHPL items can be found here.

VOSviewer

Offered by the University of Leiden (Netherlands), VOSviewer is a software tool for constructing and visualizing bibliometric networks. These networks may include journals, researchers, or individual

publications, and they can be constructed based on citation, bibliographic coupling, co-citation, or co-authorship relations. The tool can map specific terms to identify all universities cited in published works on that topic.

BIS Resources

Export Administration Regulations (EAR)
The BIS website provides an easy-to-use tool to help navigate the EAR. The contextual search option and the in-product help allow the user to easily maneuver through the many categories that make up the Commerce Control List (CCL).

Classify My Items
This tool provides instructions on how to determine the correct Export Control Classification Number (ECCN) for an item subject to the EAR.

Apply for a License
SNAP-R allows users to submit and track export license applications, commodity classification requests, reexport license applications, and license exception agricultural commodity (AGR) notifications online.

Deemed Exports
This link provides guidance on deemed exports, which refers to the sharing or release of controlled technology or source code to a foreign person within the United States.

How To Develop an Export Compliance Program
BIS provides a framework to establish successful export compliance programs that align with U.S. regulations. These guidelines highlight the necessary integration of compliance measures into daily operations, with the goal of protecting national security.

China Semiconductor Rule Frequently Asked Questions
Frequently asked questions related to the rules implementing export controls on semiconductor manufacturing equipment (SME), advanced computing items, and supercomputers. The FAQs also address ongoing national security concerns that items covered by these rules can be used for military modernization and other applications, such as the development and production of weapons of mass destruction (WMD).

Training Resources
The White House's Office of Science and Technology Policy (OSTP) published guidelines for academic research institutions that address the risks posed by strategic competitors to the U.S. research and development enterprise. The guidelines include a requirement that covered individuals complete training on export controls and compliance. Covered individuals can stay up to date on the EAR by attending in-person seminars, signing up to receive regulatory updates, reviewing learn and support modules, and watching training videos online. The seminars, modules, and videos cover different aspects of the EAR, including encryption export controls and fundamental research, as well as how to submit a license application. There is also an option to contact a counselor if there are further questions.

[July 2024: Don't Let This Happen to You!](#)

"Don't Let This Happen to You!" is a compendium of case examples highlighting BIS criminal and administrative enforcement efforts. The updated version includes new enforcement cases involving a voluntary self-disclosure by an academic institution, violations of the antiboycott regulations, firearms export violations, export violations related to China and Iran, and non-compliance with a BIS settlement agreement. Exporters are encouraged to review the publication, which provides useful illustrations of the type of conduct that gets companies and universities in trouble.

[Voluntary Self Disclosures](#)

BIS actively encourages the submission of Voluntary Self-Disclosures (VSDs) from parties who suspect they may have violated the EAR. VSDs serve as a strong indication of a party's commitment to complying with U.S. export control requirements. There is a "fast-track" resolution policy for VSDs that involve only minor or technical infractions—i.e., those without aggravating factors. Parties can submit VSDs electronically to BIS_VSD_INTAKE@bis.doc.gov.

[Enforcement Policy Memoranda and Industry Guidance](#)

A collection of documents that outline BIS's guidelines and procedures for enforcing export control laws and regulations, provide clarity on how violations and penalties are handled, and outline guidance for industry on how to comply with export controls and look for red flags when selling or transferring controlled items, software, and technology.

[Field Office Contact Information and Map](#)

Address and contact information for the Office of Export Enforcement's nine Field Offices and three Resident Offices.

Recent Export Enforcement Actions Involving Academia

[BIS Settles Alleged Export Control Violations with Indiana University](#)

On June 24, 2024, as part of a settlement agreement, BIS issued an order imposing an administrative penalty on Indiana University (IU) related to exports by IU's Bloomington Drosophila Stock Center (BDSC). As part of the settlement, IU admitted to the conduct set forth in the Proposed Charging Letter, which alleged 42 violations related to the export of a strain of *Drosophila melanogaster* (fruit flies) containing transgenes carrying *ricin A* sequences to research locations in 16 countries. Under the order, IU is required to deliver export compliance training on the EAR to relevant IU administrators and two presentations (one to a forum of stock center directors, and one to the broader university export control community) on the conduct that led to the settlement. Additionally, the order subjects IU to a one-year suspended denial order for the export of certain types of items.

[Ringleader and Company Insider Plead Guilty to Defrauding Biochemical Company and Diverting Products to China Using Falsified Export Documents](#)

On May 22, 2024, Pen Yu and Gregory Muñoz each pleaded guilty to one count of wire fraud conspiracy for their roles in a scheme to fraudulently procure deeply discounted products from Massachusetts biochemical company Sigma-Aldrich Inc., doing business as MilliporeSigma, and export them to China

using falsified export documents. Yu ordered biochemical products from MilliporeSigma with help from Muñoz, a MilliporeSigma salesperson, by falsely representing that Yu was affiliated with a biology research lab at a large Florida university. Yu paid students to use their university email addresses to place orders through the university stockroom. When the products arrived at the university stockroom, a stockroom employee diverted the products to Yu, who repackaged them and shipped them to China. To avoid scrutiny, Yu made false statements about the value and contents of these shipments in export documents. On August 2, 2024, Yu was sentenced to three years and eight months in prison, followed by three years of supervised release for conspiracy to commit wire fraud.

Princeton University Resolves Allegations of Export Law Violations with Administrative Settlement

On February 2, 2021, BIS announced an administrative settlement with Princeton University, which voluntarily self-disclosed potential violations of the EAR and cooperated with the investigation. This settlement resolved BIS's allegations that, on 37 occasions, Princeton engaged in conduct prohibited by the EAR when it exported various strains and recombinants of animal pathogens from the United States to various overseas research institutions without the required export licenses. In addition to a fine, Princeton also agreed to complete external and internal audits of its export compliance program.

Academic Outreach Initiative

Policy Memorandum Establishing the Academic Outreach Initiative

This policy memorandum established the Academic Outreach Initiative, an effort by BIS to partner with select academic research institutions through strategically prioritized engagement, the assignment of "outreach agents," and the provision of training and background briefings, with the goal of protecting against those who attempt to harm our collective national security.

Speech by Assistant Secretary for Export Enforcement Matthew S. Axelrod at the National Association of College and University Attorneys 2022 Annual Conference

This speech, delivered on June 28, 2022, announced the launch of the Academic Outreach Initiative. It explained the thinking behind the creation of the initiative and how the initiative would operate.

Remarks As Prepared for Delivery by Assistant Secretary for Export Enforcement Matthew S. Axelrod at Oregon State University on the Academic Outreach Initiative

This speech, delivered on October 26, 2022, provided an update on the progress of the Academic Initiative.

Remarks as Prepared for Delivery by Assistant Secretary for Export Enforcement Matthew S. Axelrod to the Academic Security and Counter Exploitation Program's Seventh Annual Seminar

This speech, delivered on March 8, 2023, provided advice to academia on compliance with export controls, including considerations involving fundamental research.