

Export Controls

WTAMU must comply with U.S. export control laws administered by the **Department of Commerce (EAR)**, **Department of State (ITAR)**, and **Treasury Department (OFAC)**. These rules protect national security and foreign policy interests, and all employees and students share responsibility for complying; violations may result in loss of research funding, loss of export privileges, and criminal or civil penalties. Export control obligations apply to research, teaching, purchasing, hiring, and travel, and ignorance of the law is not a defense.

Controlled Information Transfers

Sharing technical drawings, schematics, software code, or research data with foreign persons — even by email or cloud — can constitute a controlled export.

Controlled Item Shipments

Lab equipment, sensors, and certain chemicals on the Commerce Control List (CCL) or U.S. Munitions List (USML) may require an export license before shipment.

Deemed Exports

Sharing controlled technology with a foreign national in a meeting, via email, or during a presentation — even on U.S. soil — may require an export license.

Sanctioned Country Travel

Travel to OFAC-sanctioned countries for teaching or research is restricted. Carrying university-owned equipment to these locations may require additional licenses.

 Export Control Basic Training is **required for all employees** and is delivered via TrainTraq (course number **2111212**). Additional training may be required based on job function.

Understanding the Regulatory Framework

EAR – Export Administration Regulations (Dept. of Commerce)

Controls dual-use items and technologies — goods and information that have both commercial and military applications. Administered by the Bureau of Industry and Security (BIS). Items are classified on the Commerce Control List (CCL).

ITAR – International Traffic in Arms Regulations (Dept. of State)

Controls defense articles, services, and related technical data listed on the U.S. Munitions List (USML). ITAR is stricter than EAR — there are no license exceptions for most USML items. Criminal penalties up to \$1 million per violation and 20 years imprisonment.

OFAC – Office of Foreign Assets Control (Dept. of Treasury)

Administers and enforces economic and trade sanctions against targeted foreign countries, entities, and individuals. Prohibits transactions with sanctioned parties regardless of whether an export license exists.

When to Contact the Export Control Office



Before sharing research data or technical information

With any foreign national, foreign institution, or international collaborator



Before purchasing or shipping

Any equipment, software, or materials that may be subject to export licensing



Before hiring or hosting

A foreign national researcher, visiting scholar, or student in a lab working with controlled technology



Before traveling internationally

For research or teaching, especially to countries with heightened risk or sanctions

International Travel, Collaborations & Contacts

International Travel Requirements



Notify your department head of all planned international travel.



Complete the Request for Foreign Travel Form with your Notification of Absence.



Submit requests at least 90 days prior to travel — some permits take up to 6 months.



Non-essential travel to extreme risk countries is restricted per TAMUS policy.



Personal travel to a foreign adversary country requires a Certification of Personal Travel form in Workday (per Executive Order GA-48).

International Collaborations: General Prohibitions



Report All International Collaborations

All international collaborations must be reported to the export control office.



No Malign Foreign Talent Recruitment

Employees are prohibited from participating in Malign Foreign Talent Recruitment Programs.



No Confucius Institute Contracts

No contracts involving a Confucius Institute.



No Gifts from Countries of Concern

No gifts from a Country of Concern — report immediately.



No NDAA Section 1286 Agreements

No agreements with entities listed under Section 1286 of the NDAA.

 Suspect a violation? Contact the Export Control Office at exportcontrol@wtamu.edu, call the Risk, Fraud & Misconduct Hotline at **888-501-3850**, or report via the [System Ethics portal](#).

Key Contacts

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Export Control Office

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