Export Control

ROLE of RPI Investigator

RPI researchers are at the front line of export control issues because they are the ones with the control over the scope of the research project, and

They are the ones who make the decision regarding equipment or technology which will be implemented and to whom it may need to be transferred, e.g., they determine when a research project may involve a transfer of equipment or technical information to colleagues abroad or to foreign nationals within the research laboratory.

RPI investigators need to be aware of export control regulations and the possible impact on research. The term “export” as used in these regulations includes not only the actual export or shipping of goods to foreign countries, but also “deemed export” within the Us of export controlled items or information to a “non-U.S. Person.” As a result where export control regulations apply and where no regulatory exemption is available, an export license will be required before export controlled items or information may be shared abroad or on campus with foreign national/person participating or collaborating in affected projects. The following activities, among others, may be restricted:

1. The ability of foreign national/person scholars and students to participate in export controlled research at RPI.
2. The ability of RPI Investigators to disclose or discuss previously unpublished research at conferences and meetings where foreign national/person are attendees.
3. The ability of RPI Investigators to engage in collaborations with foreign investigators, including restrictions on teaching foreign collaborators how to use export controlled items in research (regulated as providing a “service”).
4. The ability to send research equipment abroad.

While such restrictions appear at odds with research traditions of open access and dissemination of results, the vast majority of university research is not subject to export controls. This is because the research does not involve export controlled items or data, or because the research involving such items or data qualifies for an exclusion or an exemption from the regulations.