16. Travel Abroad

This Section addresses the process for ensuring export control compliance when shipping or carrying tangible items associated with conferences, assignment, or conducting research abroad; and transfer of technical data by laptop or other electronic means.

CUNY personnel who intend to travel abroad for fieldwork, conferences, etc., must be familiar with whether these activities are subject to export control regulations, to the extent that the scope of activity involves the transfer of technical data and/or any commodity.\(^7\) This includes possible transfer of proprietary data by laptop, jump drive, or other portable device. Destination concerns are applicable for countries sanctioned/embargoed under OFAC, and denied party screening requirements are applicable to research partners/collaborators, etc.

As to the so-called T4 countries subject to OFAC, the analysis must not only take into account the transfer of commodities and technical data, but the travel itself (in case of Cuba) and in many cases, the full extent to which the activity provides a restricted “service” to those countries. For purposes of conducting fundamental research abroad, shipping instruments used in field research or during the course of an inter-institutional collaboration may require obtaining an export license and sufficient lead time should be taken into account in order to receive an export license/authorization as necessary.

All individuals who plan to travel internationally should review [CUNY’s Export Control Travel Briefing](#) guidance document. Any travel-related questions related to export control should be directed to the respective College’s Export Control Administrator.

\(^7\) Note that merely presenting fundamental research results at international conferences or teaching curriculum-based courses abroad do not trigger export control requirements. However, the shipping or hand carrying of materials in support of these activities may have control requirements.