



# Policy Brief

Last Revised: 9/30/2025

## 7.11 Export Control Policy

**Administering Department:** Research Compliance & Regulatory Affairs

### Scope:

#### Summary

This Export Control policy establishes the basis for procedures and processes necessary to ensure Emory's compliance with export control and trade sanctions regulations while maintaining a research and academic environment that fosters collaboration.

#### Applicability

This Policy applies to all Emory investigators, faculty, staff, visiting scientists, postdoctoral fellows, students, scholars, and any other person working at or for Emory University

### How to Comply with the Policy

To reduce individual and institutional risk of non-compliance with U.S. export control and trade sanctions regulations, Emory has established an Export Control Compliance Program under the direction of the Office of Export Control and Research Cybersecurity ("ECRC") in the Department of Research Compliance and Regulatory Affairs ("RCRA").

#### Compliance procedures include:

- Restricted Party Screening for vendors, technology transfer partners, MTAs, sponsors, international agreements, donors, collaborators, and non-immigrant visa recipients.
- Research Projects Review: Principal investigators must complete export control pre-screening for sponsored research proposals. The Office of Sponsored Programs (OSP) preserves the Fundamental Research Exclusion in awards and contracts and coordinates with the ECRC Office if restrictions apply.
- International Visitors: Reviewed per [Policy 7.12](#).
- Non-immigrant Employees: ECRC reviews job responsibilities for access to controlled technology and coordinates with HR and academic units to prevent unauthorized access.
- International Travel: Individuals traveling internationally on Emory business must comply with export control and trade sanctions regulations. RCRA collaborates with OIT, Global Engagement, and Emory Travel to ensure research data security and compliance.
- International Shipping: Procedures include license assessment, restricted party screening, and coordination with EHSO, OSP, and OTT as needed.
- International Activities: Export control review is required for international research collaborations and online distance education, especially for students from comprehensively sanctioned countries.



- **Mandatory Training:** All personnel engaged in activities subject to export control regulations must complete the export controls training module available on Emory's Learning Management System ("LMS"). ECRC provides updated training and support as regulations or institutional procedures change.

### Noncompliance with the Policy

Failure to comply with this policy and/or any of the federal rules and regulations affecting research international collaborations and exchanges will result in disciplinary actions in accordance with relevant Emory HR policies up to and including termination of employment or dismissal from academic programs. Additionally, violations of federal rules and regulations may result in sanctions, fines, and/or referral for prosecution by law enforcement officials.