Purpose

Ensure compliance with applicable U.S. export control regulations during international travel

Applicability

These procedures apply to all UCSF personnel (faculty, staff, students) who travel internationally on official UCSF business or use UCSF-owned equipment during personal travel

Procedures

I. Responsibilities
   a. Prior to Travel: Departments are responsible for implementing internal procedures for flagging export control compliance issues prior to international travel by their personnel
   b. Departments are responsible for implementing internal procedures for performing restricted party screening of foreign scholars and others UCSF personnel plan to visit or collaborate with while overseas prior to international travel.
   c. Prior to Reimbursing Travel Expenses: In cases where UCSF personnel have traveled internationally on UCSF business, but travel information was not disclosed or vetted prior to travel, Departments are responsible for flagging and escalating export control compliance issues upon reviewing expense reimbursement requests for international travel

II. Prior to international travel
   a. All UCSF employees and students are encouraged to book international business travel through the Connexxus application available in MyAccess.
      i. Use of Connexxus will automatically register personnel with WorldAware, providing benefits of UC’s travel risk management services.
      ii. Booking UCSF business travel using the Connexxus application will alert the Export Control Officer to the planned international travel to comprehensively sanctioned destinations such as Cuba, Iran, North Korea, Syria, Sudan, and the Crimea Region of Ukraine, in order to prepare pre-travel briefings, apply for licenses if required, and other risk mitigation strategies.
         1. A current list of countries of concern and sanctions programs may be found at https://home.treasury.gov/policy-issues/office-of-foreign-assets-control-sanctions-programs-and-information
         2. The lists of comprehensively sanctioned countries is subject to change so the traveler or their designated administrator should reach out to exportcontrol@ucsf.edu when travel is planned to these comprehensively sanctioned destinations or any other potential countries of concern in case the export control officer is not automatically informed to ensure proper risk mitigation is in place.
   b. If UCSF business travel is NOT booked through Connexxus or if travel insurance is not provided through UC Travel, UCSF personnel should manually sign-up for UC Travel Insurance through UC Away. Guidance is available through Risk Management and Insurance Services
i. If international travel is not booked in advance through the Connexxus, notify the Export Control Officer (ECO) at ExportControl@ucsf.edu as soon as international travel is planned.

ii. Personal International Travel may also be registered through UC Travel Insurance

c. International travel on behalf of UCSF as well as personal travel should be vetted in the following situations:
   1. UCSF-owned devices accompany the traveler (e.g., laptop, cell phone, tablet)
   2. The international traveler plans to access UCSF’s network (VPN) while traveling
   3. Performance of work on behalf of UCSF is anticipated during international traveling
   4. Academic presentations about UCSF research are planned

d. All international travelers should schedule a pre-travel briefing with the ECO along with the relevant department administrator as appropriate to discuss risk mitigation strategies including a determination of whether export control licenses may be required

i. Disclose the following information to the ECO prior to the pre-travel briefing:
   1. Planned international destination(s)
      a. Any UCSF-owned materials or data the traveler plans to take with them that may include: UCSF issued devices, laptops, or other end point devices
      b. Encrypted devices that may be subject to confiscation or forced decryption by Foreign Customs
      c. Research data
      d. Protected Health Information (PHI)
   2. Plans for secure Internet connections if traveling to a restricted country such as Cuba, Iran, North Korea, Sudan, Syria, or the Crimea Region of Ukraine
   3. The purpose of the international travel, for example field work, presentations at international conferences, etc.

III. Discovery of International Travel After-the-Fact

If international travel was not registered and vetted in advance and is only discovered after international travel occurred, the use of “MyExpense” for reimbursement of international travel costs may provide for limited after-the-fact vetting to determine if any export control violations occurred. Violations may require disclosure to the appropriate federal agency.

a. Post-Travel Screening may be identified by Supply Chain Management, Departments (e.g., Global Health Sciences), Auditors, and others.

i. When discovered after international travel has occurred, the travel must be promptly reported to the ECO at ExportControl@ucsf.edu. The report to the ECO must identify the traveler(s) and all international countries visited, including lay-over and connecting countries.
ii. If export control violations are discovered, the ECO will escalate the case to the Chief Campus Compliance Officer, Chief Ethics and Compliance Officer and/or Campus Counsel as appropriate

IV. Training and Resources

1. Departments shall all be required to either designate individuals to be able to carry out the procedures in this SOP, such as an Export Control Liaison, or provide training to all personnel as applicable.

2. Comprehensive Export Control Liaison training is available for persons serving as Liaisons for their departments. Additional training is available on-demand from the Export Control unit within the Office of Ethics and Compliance.

3. For screening of visitors to UCSF, refer to the document “UCSF Export Control Procedures – International Stakeholders” for a step-by-step guide to screening visiting students/scholars and escalation of the results to the Export Control Officer (ECO)