



HARVARD UNIVERSITY

Export Controls Guidance Statement-Remote Working

As Harvard has made the transition to on-line classes and working and conducting research remotely, it is important to remain cognizant of the export control and sanctions implications of certain activities.

- **Shipping/Transferring Research Materials Abroad:** The same export control restrictions apply whether you are shipping internationally from an on-campus location or from an off-campus location. Consult your [School/Institute's ECA](#) to confirm whether an export license is required before shipping or transferring research samples, equipment or other materials internationally.
- **Importing Materials:** Importing research samples or materials from abroad may require certain permits. Consult the University's manual on [Shipping and Transporting Research Materials](#).
- **On-line Education:** Sanctions regulations may impact the provision of on-line education. See the [University's guidance on on-line education](#) for more information. Also, it is important to implement [Zoom security measures](#) to guard against zoom-bombing by uninvited/non-registered class participants and unauthorized access to courses.
- **Unauthorized Transfers of Technology/Technical Data:** The increased reliance on Zoom and other video-conferencing platforms may lead to the inadvertent unauthorized transfer of controlled technology. Keep in mind that the mere visual inspection of drawings, technical specifications, blueprints, or similar documents through sharing your screen on Zoom can amount to a "release of technology." Exposing controlled technology or information to a single videoconference participant sitting in front of a computer screen in a foreign country, or to a foreign national seated at a computer in the U.S. (a "deemed export"), can lead to a violation of U.S. export regulations. Also, it is important to implement [Zoom security measures](#) to guard against zoom-bombing by uninvited participants and unauthorized access to controlled technology/technical data.
- **Maintaining Data Security:** Certain technologies, technical data, and software are subject to export controls and must be maintained securely, whether on-campus or off-campus. It is important to remain vigilant when storing, or transferring data through a cloud-based system, as such storage or transfer may be considered a regulated export. The transfer of controlled technology and technical data outside the U.S. using end-to-end encryption is **NOT** considered an export, provided the technology or technical data is encrypted in accordance with specified criteria (15 CFR § 734.18 and 22 CFR §120.54(a)(5)). See HUIT security recommendations for working securely while working remotely: <https://huit.harvard.edu/remote>