



THE CATHOLIC UNIVERSITY OF AMERICA

Export Control Compliance Checklist

This checklist will assist faculty and staff in determining whether a planned activity triggers export control laws. **If the answer to any of the questions below is “yes,” DO NOT proceed with the activity. Contact the Office of General Counsel immediately at tel. 202-319-5142 for assistance and guidance.**

	Does Your Activity...	Yes	No
1	Involve activities in a sanctioned country? (Review the OFAC website for a list of sanctioned countries)		
2	Involve activities with sanctioned individuals or entities, especially where services or payment to such individuals or entities will be provided? (Review OFAC's Specially Designated Nationals List (SDN) and Foreign Sanctions Evaders (FSE) List for sanctioned individuals and entities)		
3	Involve activities with a known terrorist organization? (Review the Department of State's Foreign Terrorist Organizations List for known terrorist organizations)		
4	Involve the “export” of controlled information, items, commodities or technology (including but not limited to encryption software) to foreign nationals or U.S. persons abroad, or to foreign nationals in the U.S. (“deemed export”)? (Review the Export Administration Regulations, Commerce Control List and the International Traffic in Arms Regulations, U.S. Munitions List to determine whether the information, items, commodities or technology are controlled.)		
5	Involve technology containing encryption?		
6	Involve restrictions on the publication or presentation of results of the activity, or contain a non-disclosure or confidentiality agreement?		
7	Involve the sharing, transmission or distribution of information that is not in the public domain? (i.e. not generally available to the public.)		
8	Involve sharing, transmitting or distributing technical data or information with or to a foreign national where the data or information is not part of a University-catalogued course or associated laboratory?		
9	Involve requirements, contracts or other agreements referencing or mandating compliance with “export control” regulations?		