



Ohio Administrative Code

Rule 3341-7-11 Export Control.

Effective: July 16, 2026

(A) Policy statement and purpose

(1) Statement of institutional authority

Bowling Green state university (BGSU) is committed to full compliance with all United States Export Control laws, including:

- (a) Export administration regulations (EAR);
- (b) International Traffic in arms regulations (ITAR);
- (c) Office of foreign assets control (OFAC) regulations;
- (d) Any other federal agency rules governing exports, deemed exports, foreign transactions, or restricted parties.

This policy establishes BGSU's obligation to ensure that faculty, staff, students, and affiliated personnel do not engage in export-controlled activities unless authorized under applicable laws and approved university policies.

(2) Purpose of the policy

The purpose of this policy is to:

- (a) Ensure BGSU's compliance with U.S. export control laws;
- (b) Protect the university, its personnel, and its research programs from legal and financial risk;
- (c) Establish institutional expectations for screening, review, approval, and oversight of export-controlled activities;
- (d) Define responsibilities for identifying export-controlled work and requesting review;
- (e) Require secure handling, storage, transfer, and communication of export-controlled items, technology, and data.

Detailed procedures will be maintained separately by the division of research.

(3) Governing principles



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- (a) Protection of national security - Export control laws safeguard national security, economic stability, and foreign policy interests.
- (b) Integrity of research - BGSU supports open academic exchange but recognizes legal limits on the dissemination of controlled technologies and information.
- (c) Compliance and due diligence - All individuals involved in international activities must follow export control regulations and university requirements.
- (d) Institutional oversight - The division of research will coordinate export reviews and provide training, guidance, and screening tools.

(B) Policy definitions

- (1) Export - sending or transferring controlled items, data, or technology to a foreign destination or foreign person.
- (2) Deemed export - release of controlled technology or information to a foreign person inside the U.S.
- (3) Foreign person - any individual who is not a U.S. citizen, lawful permanent resident, or protected refugee/asylee.
- (4) Export-controlled technology/data - technology or information listed on the commerce control list (CCL) or U.S. munitions list (USML).
- (5) Restricted party - an individual or entity appearing on U.S. government restricted or denied party lists.

(C) Policy scope and policy

(1) Export-controlled activities

University personnel may not engage in export-controlled activities unless reviewed and approved, including:

- (a) Sending controlled items, equipment, materials, chemicals, software, or technical data to locations outside of the United States;
- (b) Preparing or arranging international shipments that require export licenses, classification reviews, or restricted-party screening;
- (c) Hand-carrying controlled items or data during international travel;



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- (d) Sharing controlled technical data with foreign persons ("deemed exports");
- (e) Participating in international collaborations, research, training, or fieldwork involving restricted subject matter or controlled technologies;
- (f) Engaging in transactions involving embargoed or sanctioned countries, entities, or individuals;
- (g) Purchasing, using, or providing access to controlled high-technology devices, software, or instrumentation;
- (h) Providing controlled services, technical assistance, or training to foreign persons or foreign entities;
- (i) Allowing foreign visitors, students, or researchers access to controlled laboratories, equipment, or data without prior review;
- (j) Visiting or engaging foreign entities on restricted party lists;
- (k) Transmitting controlled code, blueprints, schematics, or biological materials.

(2) Export review requirement for export-controlled activities

Individuals must request export control review before:

- (a) International travel related to research, teaching, conferences, or other university business;
- (b) Hiring, hosting, supervising, or collaborating with foreign nationals, whether on campus, remote, or abroad;
- (c) Entering into contracts, MOUs, NDAs, research agreements, or other formal arrangements with foreign institutions or entities;
- (d) Receiving or sending controlled items, equipment, materials, chemicals, software, or technical data;
- (e) Beginning research, training, or fieldwork that may involve export-controlled technologies, subject matter, or restricted equipment;
- (f) Allowing foreign persons physical or electronic access to controlled laboratories, equipment, software or data.

A formal review must be completed by research integrity.



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(3) Deemed exports

A "deemed export" occurs when export-controlled technology is released to a foreign person inside the United States.

Examples include:

- (a) Allowing a foreign student, researcher, or visitor to operate export-controlled equipment;
- (b) Sharing controlled technical data, analysis, or design information;
- (c) Providing proprietary or unpublished research results subject to export restrictions.

All deemed exports require review and may require a federal license.

(4) Restricted parties and embargoed destinations

BGSU personnel may not:

- (a) Conduct transactions with individuals or organizations on restricted-party lists;
- (b) Engage with embargoed or sanctioned countries, entities or individuals;
- (c) Entering financial or contractual agreements prohibited by U.S. department of the treasury's office of foreign assets control (OFAC).

(5) Required screening

Screening must be performed prior to:

- (a) Hiring, hosting or inviting foreign visitors, students or researchers;
- (b) Making payments, reimbursements, or providing financial support to foreign collaborators;
- (c) Establishing international partnerships, agreements, or formal collaborations.

(6) Review by institution

BGSU may conduct additional review of research, collaborations, or activities involving export-control consideration. However:



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No institutional official may approve an export-controlled activity without proper review or required federal authorization.

(7) Funded research

Sponsors may impose additional export control requirements as part of awards, contracts, or cooperative agreements.

BGSU requires:

- (a) Export control review prior to expenditure of sponsored funds;
- (b) Compliance with all contract terms, conditions, and regulatory obligations;
- (c) Disclosure of foreign support, international participation, or involvement with controlled technology.

Failure to comply may result in loss of funding.

(8) Use of procedures

Research Integrity will maintain procedures addressing:

- (a) Export screening;
- (b) Controlled equipment and technology management;
- (c) Deemed export review;
- (d) International travel involving export-controlled items, equipment, materials, chemicals, software, or technical data;
- (e) Licensing requirements and authorization processes;
- (f) Reporting obligations;
- (g) Training and education related to export control compliance.

Procedures will be accessible on the research integrity website.

(9) Compliance

Violations of export control laws can result in severe penalties, including:

- (a) Personal civil and criminal liability;



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(b) Fines and imprisonment;

(c) Loss of federal funding;

(d) University sanctions;

(e) Loss of research and laboratory privileges.

Noncompliance will be addressed through university disciplinary procedures and may require mandatory federal reporting.

(D) Policy provisions

(1) Responsible office

The division of research is responsible for the oversight and implementation of this policy.

(2) Implementation of policy

WHO	TASK
Vice president for research	Ensure institutional compliance; enforce export requirements; take corrective action as needed.
Division of research/research integrity	Conduct export reviews; maintain procedures; provide training; perform restricted-party screening; coordinate licensing needs.
Principal investigators	Identify export-controlled activities; submit requests for review; restrict access to controlled technology; ensure project compliance.
Research personnel	Follow all export control rules; disclose international activities; report potential concerns.

(E) Related university policies

(1) 3341-3-83 International travel by faculty and staff.



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(2) 3341-7-12 - Malign foreign talent recruitment program.

(3) 3341-7-13 - Use of regulated biohazardous materials in research, instruction, and scholarly activities.

(F) Related government policies and guidance.

(1) Export administration regulations (EAR)

(2) International traffic in arms regulations (ITAR)

(3) OFAC sanctions programs

(4) Federal research security requirements