



Office of Academic Affairs

February 2025
The
University
of Akron

EXPORT CONTROLLED ACADEMIC ACTIVITIES

What are Export Controls?

Federal Laws limit the export of items, software, and information (“Materials”) to foreign persons or entities. **Export Controls** are the physical and cyber security processes used to protect these Materials from disclosure.

Exports can occur both when Materials are sent outside of the U.S. **and** if Materials are **shared within the U.S.** with foreign nationals. Although it is common for research activities to be affected by Export Controls, we should also be aware that Export Controls apply to some educational information.

The Educational Information Exclusion (EIE)

Information may not be export controlled when it concerns “general scientific, mathematical, or engineering principles commonly taught in schools, colleges, and universities” or “information released by instruction in catalog courses and associated teaching laboratories.”

That being said, there are instances when providing courses and educational information *is* export controlled and requires a license.

WHEN THE EIE LIKELY APPLIES

(i.e. no license required)

Undergraduate courses

Graduate level social, behavioral, or educational courses

Non-credit courses delivered through Coursera, EdX, and other university platforms, as long as the content is released in a course catalog

(FEDERAL) PENALTIES FOR VIOLATIONS

CIVIL: \$12,000 to \$1,000,000 per violation

CRIMINAL: \$50,000-\$1,000,000 + up to 20 years

Ineligibility of PI to work on federally funded research
Loss of Federal funding to the University

WHEN THE EIE MAY NOT APPLY

(i.e. license may be required-note this is a POTENTIAL license requirement)

Senior Design or Independent studies or Graduate-level STEM courses

Providing any sort of service, including online instruction, to persons in sanctioned countries, or persons ordinarily residents of a heavily sanctioned country (e.g. Cuba, Iran, North Korea, Syria, Crimea, Libya)

Teaching in an international setting

Developing or providing courses for an external entity on a contractual (e.g. service) basis

Sharing controlled unclassified information in a classroom

If your activity falls into the Gold Box of when the EIE may not apply, reach out to the Research Compliance Officer (jhanna3@uakron.edu) for a consultation.

For activities falling within the Gold Box above, but are determined NOT to need a license, UA may still document why the license is not required.

Some Federal Laws governing exports: [BIS-EAR](#) [DDTC-ITAR](#) [OFAC](#)
For additional resources, visit UA's [Research Export Control webpage](#)