POLICY STATEMENT FROM THE VICE PROVOST FOR RESEARCH ON EXPORT CONTROLS

Dear Colleague:

This Policy Statement addresses Yale’s compliance with United States (U.S) export controls while maintaining a commitment to its mission and goals as an institution of higher education.

Export controls are a complex set of federal laws and regulations designed to protect U.S. national security and economic interests, further U.S. foreign policy goals, and prevent the proliferation of weapons of mass destruction. These requirements govern how “controlled” information, technology, and items can be transmitted internationally to anyone, including U.S. citizens, or to foreign nationals in the U.S.

Fortunately, export controls do not impact the vast majority of research and other activities in which the Yale community engages. These activities typically fall under exclusions to export control requirements, such as exclusions for educational information and information that is publicly available. The most important exclusion is the fundamental research exemption, which generally applies when the results of research will be published and shared broadly within the scientific community, without any restrictions for proprietary or national security reasons (e.g., limitations on participation based on nationality or citizenship).

Although most Yale research is not subject to export controls, certain categories of equipment, technology, and information used by the Yale community in the conduct of research, or for other activities, are subject to export control requirements. These requirements may limit the dissemination and use of both information and equipment. Yale maintains an Export Compliance Program, overseen by the Director of Export Controls (donald.deyo@yale.edu) to support its faculty, staff, and students in meeting these requirements. Additionally, Environmental Health and Safety supports export control compliance through their oversight of Yale’s shipping process.

All members of the Yale community share responsibility for conducting research and other activities in accordance with export controls and related university policies and processes. This includes remaining knowledgeable about export control considerations...
related to their university activities, and consulting with Yale’s Director of Export Controls regarding questions and concerns.

Violations of export controls can result in significant civil or criminal liability for Yale and the individual(s) involved, and damage U.S. national interests and Yale's standing as a premier institution for research and learning. Any member of the Yale community should not hesitate to reach out to the Director of Export Controls with any questions or concerns regarding this topic.

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