

Export Control and Sanctions Regulations Review

Foreign Scholars and Visitors



BROWN

This form is required for foreign scholars and visitors that either (a) receive visa sponsorship from Brown University, or (b) come from comprehensively embargoed countries and territories¹. The purpose of this form is to provide information to the Office of Research Integrity/Export Control Compliance Officer to review for compliance with export control and sanctions regulations, and to provide guidance and education, if necessary, to hosting faculty and departments.

Please submit the completed form to the Office of Research Integrity (ORI) [email: juliane_blyth@brown.edu and rebecca_haworth@brown.edu]

Part I – Scholar Information

Name of Scholar:

Country of Citizenship:

Country of Legal Residence:

Visa Type (check one): H-1B O-1 J-1 Other

Part II – Additional Information (please only complete **one** of the following two sections: Section A or Section B, whichever applies)

Section A – for Scholars not paid by Brown University (e.g. Visiting Scholars):

Hosting Faculty Sponsor/Department/School at Brown:

Name of the Scholar's Home Institution/Organization/Company:

Source of Funding:

Length of Stay:

Purpose of the visit:

¹ Currently: North Korea, Cuba, Iran, Syria, Sudan and the Crimea Region of the Ukraine

Section B - for Scholars that are or will be employed at Brown:

Name of Academic Department/School:

Scholar is/will be employed as (Title):

Source of Funding/Salary:

If funding is through research grant(s)/awards, please provide all grant titles and numbers supporting the scholar.

Work Scope Information:

Please provide a detailed description of Projects/Duties on which the foreign scholar/visitor will work (OR attach a copy of the letter of support)

Part III – Additional Questions – Access to Controlled Technology/Technical Data

This section helps determine if the foreign scholar will have access to controlled technology or technical data while at Brown University or if sanctions regulations may be implicated.

1. Will you provide a stipend/honoraria or travel support for the foreign scholar? If yes, do you anticipate transactions involving a bank/bank account in an embargoed country?

2. Will the foreign scholar be involved in research projects for which the resulting information **cannot** be published freely and/or within the time frames consistent with the University's standard publication policy?

3. Will the foreign scholar be involved in any projects that either prohibit participation or require pre-approval of participation by foreign nationals?
4. Will the foreign scholar have access to equipment/technology that is identified on the United States Munitions List and thus controlled under the International Traffic in Arms Regulations?
5. Will the foreign scholar have access to any export controlled or otherwise restricted data, information, materials, or Intellectual Property?
6. Will the foreign scholar have access to any third-party proprietary information, software, materials, or Intellectual Property?
7. Will the foreign scholar have access to any data subject to a Data Use Agreement (or equivalent agreement) that does not permit data access beyond named parties at Brown?

Part IV – Attestation (this part is only required for **H-1B and O-1** applications)

The U.S. Citizenship and Immigration Services (USCIS) Form I-129 requires the inclusion of a “Deemed Export Attestation” for all new and extension H-1B petitions and O-1 petitions. With this attestation, the visa petitioner (i.e. the department sponsor and the University) certifies whether a license or other government authorization is required for the release of export controlled technology or technical data to the foreign scholar while in the United States during their employment.

Please check one

- I certify that a license is not required from either the U.S. Department of Commerce or the U.S. Department of State for our school or institution to release such technology or technical data (as defined in the EAR or the ITAR) to the foreign person.
- I certify that a license is required from either the U.S. Department of Commerce or the U.S. Department of State for our school or institution to release such technology or technical data (as defined in the EAR or the ITAR) to the foreign person unless and until the required license or other authorization has been obtained.

Part V – Signatures

I understand that as the visa sponsor, Brown University may make representations to the U.S. government based on the information provided herein. I certify that the answers provided are true and correct to the best of my knowledge. I further understand that if I provide materially false, fictitious, or fraudulent statements or representations, there may be civil and criminal penalties.

Name of Hosting Faculty or Department Chair [please print]:

Signature:

Date:

Compliance Officer Name:

Compliance Officer Signature:

Date: