



**Office of the Vice Provost for Research  
Office of Research Security, Integrity, and Compliance**

**FOREIGN NATIONAL POSTDOC  
EXPORT CONTROL FORM**

**Parts I, II & III on this form must be completed and signed by the Principal Investigator (PI) sponsoring a Foreign National Postdoc Applicant**

Under U.S. law, the transfer or release of export-controlled technology, technical data or source code to a foreign national is “deemed” to be an export to that foreign national’s country of citizenship and/or permanent residence. This “deemed” export can occur even if the foreign national is legally in the U.S. and working, researching or studying at a university. Unless an authorized license exemption or exception applies, the sharing of export-controlled items and technology requires an export license issued by the U.S. Government.

This form provides the required information to determine whether a Foreign National Postdoc at Boston College will be exposed to any export-controlled items or technology, and if so, whether an export license is required and/or the Foreign National Postdoc’s access will be limited by a Technology Control Plan (TCP).

**If you have any questions regarding the information requested on this form, export licenses or TCPs, please contact the VPR’s Office of Research Security, Integrity, and Compliance (RSIC) for assistance.**

**Part I – Foreign National Postdoc Information**

Name: \_\_\_\_\_  
Country(ies)\* of Citizenship: \_\_\_\_\_  
Country(ies)\* of Legal Residence: \_\_\_\_\_  
Country of Birth: \_\_\_\_\_  
Visa Type (check one):  H-1B  O-1  J-1  F  Other  Unknown  None  
Start Date of Appointment: \_\_\_\_\_  
Short description of the research/work the Foreign National Postdoc will perform at BC:

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\* If the Foreign National Postdoc has multiple countries of citizenship and/or legal residence, each country must be listed on this form.

## Part II –Access to Controlled or Restricted Items, Technology and Technical Data

1. Will the Foreign National Postdoc’s job, research, duties or activities at Boston College involve biology, chemistry, physics, neuroscience, engineering, earth and environmental science, computer science, nursing or another scientific field\*?  
 Yes  
 No  
\*If another scientific field, please specify: \_\_\_\_\_
2. Will the Foreign National Postdoc’s job, research, duties or activities at Boston College require use of, or access to, BC laboratories and/or BC core facilities?  
 Yes  
 No  
If yes, please list the labs & core facilities: \_\_\_\_\_
3. Will the Foreign National Postdoc be involved in, or have access to, any research projects for which there are publication restrictions?  
 Yes  
 No
4. Will the Foreign National Postdoc be involved in, or have access to, any research projects that either prohibit participation or require pre-approval of participation by foreign nationals?  
 Yes  
 No
5. Will the Foreign National Postdoc have access to equipment or technical data known to be included on the U.S. Munitions List (USML)/controlled under the International Traffic in Arms Regulations (ITAR)?  
 Yes  
 No
6. Will the Foreign National Postdoc have access to physical items or equipment known to be included in the 600 series (ECCNs ending in 600-699) or 500 Series (9X515 ECCNs) on the Commerce Control List (CCL), which is part of the Export Administration Regulations (EAR)? *(NOTE: The “600-series” describes military items that were once subject to the ITAR. The “9X515 ECCNs” describe “spacecraft,” related items, and some radiation-hardened microelectronic circuits that were once subject to the ITAR under USML Category XV.)*  
 Yes  
 No
7. Will the Foreign National Postdoc have access to any technology or data, known to be controlled by the EAR (excluding technology classified as EAR99)?  
 Yes  
 No

8. Will the Foreign National Postdoc have access to any Boston College-owned Intellectual Property or otherwise restricted proprietary data?
  - Yes
  - No
  
9. Will the Foreign National Postdoc have access to any restricted third-party proprietary information, including information restricted by Non-Disclosure Agreements (NDAs) or confidentiality agreements?
  - Yes
  - No
  
10. Will the Foreign National Postdoc need to conduct any Boston College-affiliated research from an overseas location during their appointment, including during personal travel to their home country?
  - Yes
  - No
  
11. Will the Foreign National Postdoc collaborate with foreign nationals not affiliated with BC, or with any foreign institution or entity, while they conduct research at BC? [Note: This question concerns foreign research collaborations independently conducted by the Foreign National Postdoc, not those undertaken by your research group.]
  - Yes
  - No
  
12. Will Boston College provide any compensation or reimbursement to the Foreign National Postdoc, the payment of which will involve a financial institution located in a U.S.-sanctioned country or region?
  - Yes
  - No

**Part III – Sponsoring PI Signature\***

**I understand that as the visa sponsor, Boston College may make representations to the U.S. Government based on the information provided herein. I certify that the answers provided on this form 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 administrative, civil, and criminal penalties.**

Name of Sponsoring BC Faculty/Staff & Department: \_\_\_\_\_

Signature: \_\_\_\_\_ \*

Date: \_\_\_\_\_

\*Please do not select the "Lock document after signing" option in the *Sign As* dialog box or the *Sign Document* dialog box. Locking the document prevents VPR staff from signing this form after their review.

**Part IV – RSIC Export Control & Sanctions Compliance Review (For VPR Staff Only)**

**A. I-129 Certification Regarding the Release of Controlled Technology or Technical Data to Foreign Persons in the United States**

**This I-129 Certification section is only required for Foreign National Postdoc applicants with H-1B or O-1A Visas**

With respect to the technology or technical data the sponsoring PI will release or otherwise provide access to the Foreign National Postdoc, the EAR and ITAR have been reviewed in conjunction with assertions made by the sponsoring PI, and it is determined that:

1.  A license is not required from either the U.S. Department of Commerce or the or the U.S. Department of State to release such technology or technical data to the foreign person; or
2.  A license is required from either the U.S. Department of Commerce or the or the U.S. Department of State to release such technology or technical data to the foreign person and the sponsoring PI will prevent access to the controlled technology or technical data by the foreign person until and unless the sponsoring PI has received the required license or other authorization to release it to the foreign person.

**B. Notifications:**

- Office of Technology Transfer & Licensing
- Office of Research Infrastructure & Operations
- Office of General Counsel
- Other \_\_\_\_\_

**C. Review Determination:**

- No Identified Export Control or Sanctions Compliance Issues
  - Approved - No Further Action Required
- Export Control or Sanctions Compliance Issues Identified
  - Approved - No Further Action Required
  - Approved - Exemption/Exception Applied: \_\_\_\_\_
  - Approval Pending U.S. Government Issued Export License
  - Denied

RSIC Reviewer Name: \_\_\_\_\_ Date of Review: \_\_\_\_\_

RSIC Reviewer Signature: \_\_\_\_\_