Hosting International Visitors

VCU works to maintain an openness in research and encourages collaboration with faculty, staff, and students from around the world. The University realizes that while welcoming international visitors, scholars, and students, it is also required by federal regulations to monitor international individuals assigned to research projects on campus to ensure their presence does not lead to any export control violations. Export control laws limit foreign persons' access to export-controlled information, and such access may require an export license.

When hosting international visitors, export control regulations must be considered to avoid possible violations. To limit the possibility of an export control violation occurring as a result of an international visit to campus, OVPRI reviews each visit for the following:

- Is the visitor or their institution a prohibited party on a [U.S. Government Restricted Party List](#)?
- Does the hosting faculty member/laboratory have controlled research projects and if so, does the applicable technology control plans need to be revised to address the visitor's presence within the lab?

If a visitor or their institution is on a restricted party list or the visit presents too high of a risk of an export control violation, the visit may not be approved.

All international employees and visitors must be processed through VCU's Global Education Office. An export control review will be performed on all foreign persons regardless of employee or visitor status. If you plan to hire an employee who is not a citizen of the U.S. (needs an H-1B or J Visa), if you plan to invite an international visitor, or if you plan to have another researcher conduct research in your lab (Visiting Scholar) you must login to the [RAMS ECO](#) system and complete a Visa review smart form. Hosts of International visitors that do not require a Visa review must complete the [International visitor pre-screen form](#). This form should be completed at least 10 business days prior to the visitor's arrival.

The largest risk to hosting international visitors as it pertains to export control laws and regulations, is a "deemed export." A "deemed export" is when export-controlled technology is released to a foreign national in the United States. Technology can be released when:

- it is made available for visual inspection, such as technical specifications, plans, or blueprints
- it is exchanged verbally
- it is made available by application under the guidance of a person with knowledge of the technology

Hosts of international visitors should be aware of the ways in which a deemed export could occur and are responsible for ensuring that no technical data or controlled equipment are present when non-US visitors are in the area. They must also ensure that non-US visitors are escorted when visiting facilities with controlled technologies, and are not given keys/keycards, combinations, passwords or other access to research facilities in which export-controlled research is being performed. Should an international visitor need access to research information or equipment that is controlled by export laws, a license may be required.

If you have questions about hosting international visitors on campus, please reach out to the Export Compliance Program at exportctrl@vcu.edu.