

International Student Services

International Student Services (ISS) assists over 2,000 international students and their dependents at the University of Oklahoma¹. ISS oversees the immigration status of international students in F and J visa status, and serves as a key resource for federal immigration regulations regarding student visa categories. ISS maintains OU's compliance with the Student and Exchange Visitor Information System (SEVIS). Compliance with SEVIS is required by academic institutions who admit foreign students. ISS monitors foreign students' progress both during the degree program and afterward in periods of practical or academic training and is the designated office for creating, extending, or terminating visas. It is in these capacities that ISS may encounter export control issues.

There are three main government agencies that regulate exports: the Bureau of Industry and Security (BIS), the Department of State (DOS), and the Office of Foreign Assets Controls (OFAC). BIS regulates dual-use commodities, DOS regulates defense items and services, and OFAC administers sanctions. The US Government has designated four countries as "State Sponsors of Terrorism." These countries are Cuba, Iran, Sudan and Syria. Interaction with these countries is extremely limited and exports are prohibited.

An export is any item, including commodities, software, or technology that is sent from the United States to a foreign destination. The release of technology or source code to a foreign national inside the United States is also considered an export to the individuals' home country and is referred to as a "deemed export." The vast majority of the OU's activities are not subject to export control regulation because certain commodities, software, technologies, and activities are **not** subject to export control regulations. These include published information and software², fundamental research³, and educational information which is defined as information released by instruction in catalog courses at academic institutions⁴. Export control issues could arise when a foreign national deviates from the activities approved for his or her visa status or during authorized periods of Curricular Practical Training, Optional Practical Training, or Academic Training.

ISS maintains its own guidelines and checklist regarding F and J nonimmigrant visa statuses. In the event that a student in F or J visa status who is from a T-4 country deviates from their approved field of study, ISS will e-mail the Office of Export Controls with the student's country and the unapproved field of study for an export analysis.

¹ The University of Oklahoma Health Sciences Center (OUHSC) is considered a separate campus for F-1 immigration purposes. OUHSC provides support for their F-1 students.

² 15 CFR §734.7; IEEPA §1702(b)(3); TWEA §5(b)(4)

³ *Id.* §734.8

⁴ *Id.* §734.9

CONTACT:

Please contact the Office of Export Controls with any questions.

Wayne Edgar
Export Controls & Facility Security Officer
University of Oklahoma
wayne.edgar@ou.edu
325-5052

DRAFT