# Purpose

International remote work is an increasingly common arrangement across employers including educational institutions. Contained in this document are considerations, process and guidance to assist in determining if a remote work arrangement is in the best interest of the research activities.

# Scope

The scope includes faculty, staff, graduate students and postdocs who are requesting authorization to work remotely from an international location.

# Responsibilities

Support Team:

 Award Management Grant and Contract Officer: Placing any ERA modification task on hold as internal process occurs and determining cost allowability

 Export Control Group (e.g. Proposals and Negotiations Team): Review for any potential conflicts involving export control regulations and export restrictions in award/contract. Contacting sponsor to either obtain approvals or provide notification after review of award terms and conditions. Completing the internal review and managing the overall process.

 Research Administrator: Provide current CV and complete the International Remote Work Questionnaire and submit to the Export Control Team.

Advising Parties:

 Institutional Official - Waiver determination/approval

 Executive Director, Research Operations – Waiver determination/approval

# Business Process

* ASU Sponsored Office notified by PI and/or Research Administrator about intent for sponsored project work (funded) to take place from an international location. Prior to sending notification, the PI and/or Research Administrator need to review and address the following considerations and under the following scenarios international remote work is not permitted.

**Scenarios were international remote work is not permitted:**

* + Undergraduates are not eligible for remote work assignments outside the United States;
	+ The work can be performed by someone within the United States

**Considerations before completing the International Remote Work Questionnaire:**

* + Remotely working from the following countries is not allowed (without a waiver and must have Provost approval before submitting request to export control);
		- China
		- Libya
		- Russia
	+ Remotely working from the following countries will take a significant amount of time to approve and will cost a substantial amount of money per ASU Tax Services due to tax treaty issues;
		- N. Korea
		- Iran
		- Syria
		- Sudan
		- Cuba
		- Venezuela
	+ Direct Deposit has to be in US Dollars and in US bank account;
	+ Cases are referred to the campus research cyber security manager, to corroborate and approve the cyber platforms involved in the remote work;
	+ The employee must be able to compete the work remotely;

Once the above considerations are addressed the following shall occur:

* + PI and/or Research Administrator directed to fill out Questionnaire and provide attachments as outlined in form to export.control@asu.edu Note: Any ERA modification tasks received by AMT are placed in status of hold as internal process occurs;
	+ Approval is not guaranteed.  Please be sure all reviews, approvals, and controls are in place before work begins or an employment commitment is made.
* Export Controls (EC) completes internal process, which includes but not limited to the following:
	+ Review of form for completeness and request additional information/clarifications, as needed;
	+ Visual Compliance Screening of Individual(s), location of remote worksite and colleagues (as applicable);
	+ Review CV and complete visual compliance screening, as needed;
	+ Review of proposal, award terms/conditions and compliance;
		- When additional compliance review (Human Subjects, Conflict of Interest, or Conflict of Commitment review is required;
			* If required, contact ORIA at research.integrity@asu.edu
	+ Export Controls needs to provide the green light for each international employee, if they’re working remotely (NOTE: EC only acts in an advisory role and does not provide the final approval or disapproval);
	+ Sponsor notification of intent for project work/collaboration to occur at international location
	+ Documentation Storage

If following guidance above, Export Control group identifies item(s) of concern, then elevated to Institutional Official and Executive Director, Research Operations.

If following guidance above, Export Control group identifies no known concerns, then Export Control Group sends Sponsor notification and/or approval (e.g. dependent upon award terms/conditions).

Once read receipt obtained or approval obtained, then Export Control group, notifies AMT GCO, RA and PI for updating of task and determination of cost allowability (e.g. AMT responsibility).