




PRAIRIE VIEW A&M UNIVERSITY

A Member of the Texas A&M University System

Version: 1.0	Effective Date: June 20, 2018
Title: International Shipping	
Approved by: Cajetan M. Akujuobi, M.B.A., Ph.D.E.E., P.E. Vice President for Research, Innovation and Sponsored Programs	
Signature: 	Date: June 20, 2018

1. Purpose

The purpose of this rule is to ensure that all items shipped internationally are screened to ensure that an Export Controls license is obtained if needed. Shipping regulated items out of the U.S. without a license can result in significant individual fines of up to \$250,000 and up to ten (10) years imprisonment.

It is the responsibility of PVAMU employees who are shipping items outside the United States (including hand-carrying items such as research equipment, materials, data, or biological or chemical materials) to comply with export control laws and regulations.

2. Scope

This SOP pertains to the process of routing and screening international shipments. This SOP does not cover the process for domestic shipments.

3. Responsibilities

3.1. The Export Control Officer (ECO) is responsible for:

- 3.1.1. Determining if an item is export controlled and requires a license.
- 3.1.2. Working with the Principal Investigator to obtain a license when necessary.
- 3.1.3. Assisting with international shipment packaging.

3.2. Principal Investigator (PI) and/or Departmental Representative is responsible for:

- 3.2.1. Contacting the ECO regarding all internal shipments.
- 3.2.2. Providing a list of all items to the ECO for review.
- 3.2.3. Ensuring proper documentation has been obtained prior to international shipments.

4. Reference Documents

4.1. *Decision Making Tree for Shipping*

<https://www.pvamu.edu/research/office-of-research-compliance/export-controls/resources/>

4.2. *The International Traffic in Arms Regulations (ITAR)*

<https://www.gpo.gov/fdsys/pkg/CFR-2011-title22-vol1/pdf/CFR-2011-title22-vol1-chapI-subchapM.pdf>

4.3. *Export Administration Regulations (EAR)*

<https://www.bis.doc.gov/index.php/regulations/export-administration-regulations-ear>

4.4. *Office of Foreign Assets Control Regulations (OFAC)*

<https://www.treasury.gov/resource-center/sanctions/Pages/CFR-links.aspx>

4.5. *15 CFR- Commerce and Foreign Trade*

https://www.ecfr.gov/cgi-bin/text-idx?gp=&SID=076f25681e46f67b4923a44fa386f297&mc=true&tpl=/ecfrbrowse/Title15/15tab_02.tpl

4.6. *PVAMU Export Controls Manual*

<https://www.pvamu.edu/research/office-of-research-compliance/export-controls/resources/>

4.7. *International Shipping Invoice*

<https://www.pvamu.edu/research/office-of-research-compliance/export-controls/resources/>

5. **Procedure**

5.1. Contacting the Export Control Officer (ECO) regarding International Shipments

5.1.1. The Principal Investigator (PI) or Departmental Representative responsible for shipping items must contact the ECO at the time that an item is identified as needing to be shipped internationally.

5.1.1.1. If the item is research related or has a potential to be controlled, the ECO must be contacted at least two months prior to the scheduled shipment date.

5.1.1.2. Domestic shipments do not require review by the ECO.

5.1.2. The PI or Departmental Representative must provide the following information to the ECO for review via email.

5.1.2.1. A list of the items to be shipped, and their use,

5.1.2.2. The shipment location,

5.1.2.3. The end-user of the shipment (who the item is being shipped to),

5.1.2.4. The end-use of the item being shipped (what will the end user use the item for),

5.1.2.5. Proposed shipping date.

5.1.3. The ECO will contact the PI and/or Departmental Representative with any questions.

5.2. Shipment Determination

5.2.1. Once the ADRC has all requested information, the ADRC will screen the items, shipment location and end user using the Visual Compliance software.

5.2.2. If the shipment is to an embargoed/sanctioned country, the ECO will review the activity to determine if it is authorized or restricted under Office of Foreign Assets Control (OFAC) regulations.

5.2.3. The ECO will make one of the following determinations:

5.2.3.1. No license is required

5.2.3.2. A license exclusion or general license applies to the transaction

5.2.3.3. A license is required for shipment

5.2.3.4. It is an invalid transaction.

5.2.4. If the ECO's determination is 5.2.3.1 or 5.2.3.2, the ECO will notify the PI and/or Departmental Representative that they may move forward with the shipment. Refer to section 5.4.

5.2.5. If the ECO's determination is 5.2.3.3 or 5.2.3.4, the ECO will consult with the Empowered Official prior to moving forward.

5.2.5.1. The PI and/or Departmental Representative will be notified of the preliminary determination.

5.2.6. After consulting with the Empowered Official, if it is determined that the shipment is an invalid transaction, the ECO will contact the PI and/or Departmental Representative informing them that they may not move forward with the transaction.

5.2.6.1. The reason for the determination will clearly be stated in the notification to the PI and/or Departmental Representative.

5.2.7. If the determination is that a license must be obtained, the ECO will notify the PI and/or Departmental Representative and move forward with the Empowered Official to apply for the necessary license(s).

5.3. Applying for a License

- 5.3.1. If an item is controlled under ITAR, the Empowered Official will submit a license application with the DDTC through the DTrade electronic system.
- 5.3.2. If an item is controlled under the EAR, the ECO and Empowered official will work with the PI to apply for a license with the BIS through the SNAP-R electronic system.
- 5.3.3. Once the appropriate license(s) has been obtained, the PI and/or Departmental Representative will be notified to move forward with the shipment. Refer to Section 5.4.
 - 5.3.3.1. If the license is rejected, the ECO will notify the PI and/or Departmental Representative informing them that they may not move forward with the transaction.

5.4. Shipment of Item

- 5.4.1. The ECO will work with the PI and/or Departmental Representative to ensure that all necessary documents are included in the package.
- 5.4.2. Documents that may be required may include, but are not limited to:
 - 5.4.2.1. Airway Bill
 - 5.4.2.2. Destination Control Statement
 - 5.4.2.3. Certificate of Origin
 - 5.4.2.4. International Shipping Invoice

5.5. Record Keeping

- 5.5.1. The PI and/or Departmental Representative, as well as the ECO, must retain all records associated with the shipment for at least five years.

6. Revision History

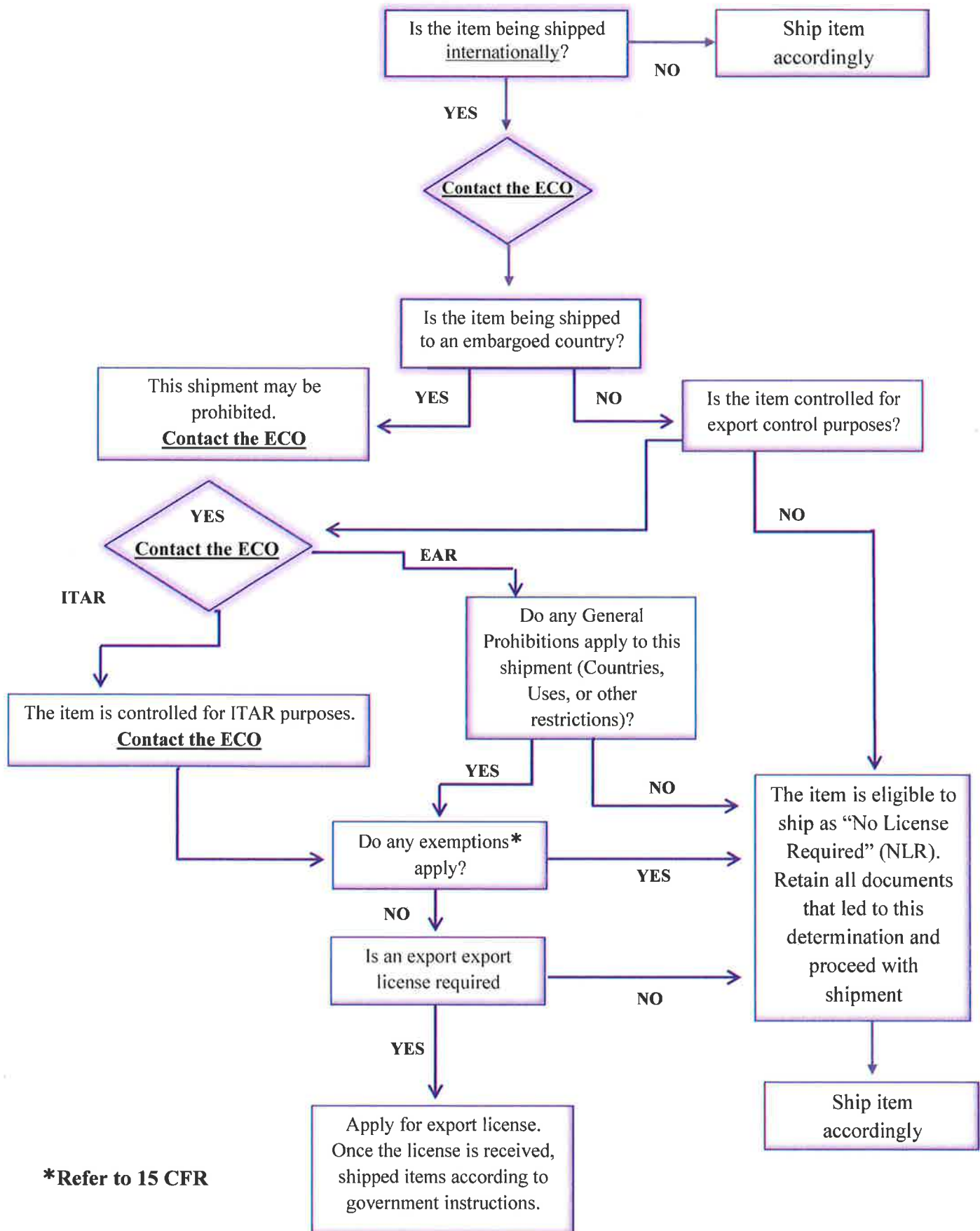
- 1.0 - This is an original procedure.

Contact Information

If you have any questions, please contact the Office of Research, Innovation and Sponsored Programs:

Associate Director of Research Compliance
Office of Research, Innovation and Sponsored Programs
Phone: 936.261.1553
Email: research@pvamu.edu

Decision Making Tree for Shipping



***Refer to 15 CFR**