




UNIVERSITY OF SOUTH ALABAMA

MEMORANDUM

DATE: January 18, 2023

TO: University Campus Community

FROM: Dusty Layton, Executive Director
Office of Research Compliance ar 

RE: International Shipping Policy: Exports and Review of International Shipments

This memorandum introduces new policy and procedures for reviewing export compliance involving international shipments. This [policy](#) is now accessible on the University Policy Library webpage. The laws, which include international sanctions programs, also restrict activities with certain countries and with designated institutions, entities and individuals, even if no controlled items are involved.

Effective immediately, all international shipments must be reviewed by the Office of Research Compliance and Assurance prior to shipment to ensure that a license is not required and that items are not being exported to a denied or restricted entity or individual. To assist in the evaluation of potential international shipping concerns, an [International Shipping Request form](#) has been created using REDCap and is accessible via the Office of Research Compliance Export Controls webpage. This electronic web application allows for efficient data collection and review, while streamlining communication and documentation of outcomes. For detailed information regarding the International Shipping policy, request form and guidance, to include a Shipping Request Quick Guide, please see the [Export Controls website](#).

The Office of Research Compliance and Assurance will assess, prior to exporting an item, (1) what is the item, product or information and if it is subject to Export Control regulations, (2) where is the item going and is the destination country embargoed or sanctioned, (3) who is the end user and is the end user a restricted party, and (4) what is the intended end use and is the end use prohibited. For example, shipment of a commercial item with a typically low level of control but is intended to be used for military or space purposes would be restricted and require a license. Generally speaking, domestic shipments do not require a license, unless the shipment is to an end user of concern or for a prohibited end-use.

For an export controlled item needing a license, it may take 30-90 days to obtain approval from the government. The intent of the Office is not to discourage international shipping and partnerships but to assist the University community in ensuring compliance with applicable federal requirements. Shipping mistakes can be costly and violate Export Control regulations. We note that settlement agreements between various external universities and the U.S. Department of Commerce has underscored the importance of international shipping compliance within a university setting.

Published works and personal correspondence are not subject to export controls and, therefore, can be shipped to international recipients without needing to submit an International Shipping Request Form, unless the total value of the shipment exceeds \$2499.

“Published works” include scholarly works (journals, individual articles, textbooks, presentation papers, publicly available theses and dissertations, posters etc.), published books, and similar printed material. **Unpublished manuscripts may be subject to export controls if they contain research data not intended for publication, so consult with your export compliance coordinator prior to exporting these items.**

“Personal correspondence” includes personal and professional messages (letters to relatives, communication with a conference organizer etc.), and awards (certificates, plaques etc.).

Lastly, University employees who engage in international shipping are responsible for ensuring compliance with U.S. export control laws. The University of South Alabama is the shipper of record for all shipments sent by the university. You may not rely on the freight forwarder (e.g. FedEx, UPS, DHL, etc.) for export control compliance; rather, the freight forwarder will rely on the information provided to them by the shipper. University employees who export items without completing the International Shipping Request Form may be held personally liable for violations.

Contact the Office of Research Compliance and Assurance for any additional questions you may have regarding international shipping activities at 460-6509 or aswilliams@southalabama.edu

cc: Angela Williams, Assistant Director, Research Compliance and Assurance