

Exports and International Sanctions

With homeland security a major priority over the past three years, the federal government has substantially increased its scrutiny of university compliance with federal regulations controlling the export of goods, technologies and information. In response, the University of Pittsburgh recently reviewed its own policies and practices with regard to the export regulations and is in the process of developing new procedures and educational training to aid in compliance.

Exports of Purchased Goods and Services

There are several export regulations with which the University must comply including the Export Administration Regulations (EARs), the International Traffic in Arms Regulations (ITARs) and others. These regulations restrict the export of certain goods, technologies and information, and both federal departments maintain lists of items that are restricted from export, as well as specific countries that may be banned from receiving such goods from the United States.

If you are purchasing products that will be shipped from the supplier to locations outside of the U.S., or are contracting for services to be performed at locations outside of the U.S., the following procedure applies:

1. Department identifies international delivery requirement.
2. The department will select a supplier and complete a University of Pittsburgh requisition form either in PRISM or by paper if PRISM access is not available.
3. Notify the Purchasing Department via a Purchasing Requisition Inquiry at <http://www.bc.pitt.edu/purchasing/inquiries.html>. This inquiry should state that you have equipment that will need to be shipped from a supplier to a location outside of the United States.
4. A Purchasing Services representative will contact you within 24 hours to ensure that all required documentation is completed.
5. After speaking to the representative, forward all documentation to Purchasing Services, 3328 Cathedral of Learning.
6. A Purchase Order will be created and the Purchasing Services Department will coordinate directly with the supplier to determine their ability to ship the equipment overseas directly. If the supplier does not have the ability to comply with export regulations, we will coordinate the shipment directly with the University's import/export broker.

International Sanctions

In addition to EARs and ITARs, the U.S. Treasury Department Office of Foreign Assets Control (OFAC) maintains both its own list of foreign countries against which the United States has issued economic or trade sanctions, and lists of suspected terrorists, drug traffickers or others engaged in illicit activities. See the OFAC website at <http://www.treas.gov/offices/enforcement/ofac/> for further details.

OFAC has the authority to control transactions with any of the persons or countries on its list – and even seize the U.S.-based assets of entities on the list. The agency has become more active lately in examining transactions with charitable organizations which the United States suspects of supporting terrorism. As a result, a number of foundations and other grant-making organization

are beginning to require a certification from universities stating that they do not conduct business with any country or person on the OFAC list.

The Purchasing Services, along with the Office of General Counsel, will assist you in complying with all international economic and trade sanctions related purchases of goods and services. Purchasing Services regularly compares all existing University suppliers and service providers to the OFAC lists to ensure compliance. Purchasing from University-wide contracted suppliers (see list at <http://www.bc.pitt.edu/purchasing/downloads/arContSupp.pdf>) provides the greatest degree of assurance that your supplier or service provider is not currently subject to international sanctions, and it is the fastest way to order a product or service.

If the product or service is unique and cannot be provided by a contracted supplier, however, we can provide assistance in ensuring compliance with any sanctions. If you believe that a supplier or service provider used by your department may be subject to these sanctions, please notify us via a Purchasing Requisition Inquiry at <http://www.bc.pitt.edu/purchasing/inquiries.html>. Your inquiry should provide as much information as possible about the supplier or potential supplier such as name, address, tax identification number, and the type of goods and services that you are considering for purchase. A Purchasing Services representative will contact you within 24 hours to provide assistance.

More information on export compliance can be found at
<http://www.pitt.edu/~provost/memo102604.html>