



Export Control Procedures – Purchasing		
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Purpose

To ensure that controlled equipment, instruments, and other materials used to support fundamental research at UCSF is identified, tracked to ensure compliance with any access restrictions and any outbound export of these materials is appropriately flagged for compliance controls.

Applicability

These procedures apply to purchases of equipment, instruments, and other materials by UCSF, regardless of the office of the individual involved in purchasing.

Procedures

I. Identify Export Controlled Materials Before Purchasing

1. Flag purchases of materials for which the following language or descriptions is included in purchasing document or correspondence with vendors:
 - a. “No foreign nationals” or “Restricted to US persons only”
 - b. “ITAR” (International Traffic in Arms Regulations) or “USML category”
 - c. “Export restricted” or “Export Controlled”
 - d. “Export Administration Regulations (“EAR”) or “Export Control Classification Number” (“ECCN”)
 - e. “US only” or “US Persons Only” or similar restriction
 - f. “Controlled items” or “restrictive access”
 - g. “Controlled technical information” or “controlled equipment”
 - h. “Compliance with Export Control Regulations”
 - i. “Embargoed Countries” or references to Cuba, Iran, North Korea, Syria, Sudan or the Crimean Region of Ukraine
 - j. An “end-use” statement is required
2. For purchases identified as ITAR or EAR, follow these steps to determine when to request the assistance from [UCSF Export Control Officer](#):
 - a. Is the item or technology classified as ITAR?
 1. If yes, STOP and Escalate to exportcontrol@ucsf.edu
 2. If no, continue
 - b. Is the item classified under the Export Administration Regulations (EAR) such as when the vendor provides you with the ECCN?
 1. If yes, document the ECCN while proceeding with the purchase
 2. Notify exportcontrol@ucsf.edu of the ECCN
 3. If the ECCN is EAR99 Proceed with the purchase without notifying exportcontrol@ucsf.edu
 - c. For unusual situations such as the vendor insisting that their “standard terms” include unusual language or verbiage as described herein, or for any other unresolved concerns, contact exportcontrols@ucsf.edu or call Brian Warshawsky directly at 415-502-0687

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3. Flag purchases of materials when the description of the items(s) to be purchased or the details of the transaction involve any of the following (particularly high-risk purchases may include electronic or sophisticated pieces of laboratory equipment or software):
 - i. Military-like equipment and technology such as:
 - a. Navigation, Avionics, Radar equipment
 - b. Night vision equipment, infrared cameras, and thermal imaging devices
 - c. Space-related technology including satellites and radiation-hardened components
 - d. Viruses, and biological agents
 - e. Nuclear items including radioactive materials
 - f. Military-grade SENSORS
 - g. Naval equipment such as Sonobuoys and submersible vessels
 - h. Military communications systems or high-frequency radio apparatus
 - i. Military gear or items with ruggedized components
 - j. Unmanned aerial vehicles (UAVs)
 - k. Advanced Lasers
 - l. Gas monitoring or filtration devices
 - m. Spectrometers
 - n. Gravimeters
 - ii. Foreign sponsor, foreign vendors, or collaborators from countries of concern such as Syria, Sudan, North Korea, Cuba, Iran and potentially Russia.
 - iii. Additional transaction red flags such as:
 - a. Military sponsors (foreign or domestic) including the Department of Defense, (DOD) Defense Advanced Research Projects Agency (DARPA), space agencies such as NASA, and the Jet Propulsion Laboratory (JPL), nuclear agencies such as the National Energy Technology Laboratory (NETL) and the National Nuclear Security Administration (NNSA)
 - b. Shipping to international destinations including plans for hand-carrying items for overseas projects
 - c. Vendor refusal to provide export control classification numbers or status of the item(s) or vendor language which places this burden on the buyer
 - d. Item(s) purchased are discovered to be classified or listed as under the International Traffic in Arms Regulations (ITAR)
 - e. End-User or party requesting the purchase plans to return an item to a foreign source
4. Unresolved concerns should all be escalated to exportcontrol@ucsf.edu or call Brian Warshawsky directly at 415-502-0687.

II. Training and Resources



University of California
San Francisco

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1. Departments shall all be required to either designate individuals to be able to carry out the procedures in this SOP, such as an Export Control Liaison, or provide training to all personnel as applicable.
2. Comprehensive Export Control Liaison training is available for persons serving as Liaisons for their departments. Additional training is available on-demand from the Export Control unit within the Office of Ethics and Compliance.
3. For a simplified quick-reference of this purchasing process, follow the 3 Step purchasing infographic available at [here](#).