EXPORT CONTROL POLICY

SLT 3.6

Date of Last Update:
April 24, 2019

Approved By:

- Senior Leadership Team

Responsible Office:
Center for Scholarly and Creative Excellence

POLICY STATEMENT

All personnel at Grand Valley State University, including faculty at all levels, staff, students, visiting scholars, and all other persons herein referred to as "GVSU Personnel" retained by or working at the University must comply with all U.S. export control laws and regulations while teaching, conducting research, or providing service activities at or on behalf of the University. No GVSU Personnel may engage in any export activity that is prohibited by the U.S. Department of Commerce, the U.S. Department of State, the U.S. Department of Treasury's Office of Foreign Assets Control, or any other government agency that enforces export laws/regulations. Similarly, GVSU Personnel may not transfer any controlled item, including technology and technical data, to any foreign nationals inside or outside the United States territory without approved documentation.

Compliance with export control laws and regulations must be considered and if necessary achieved *before* engaging in science or technology-based research, executing contracts or other agreements, purchasing high-technology devices or software, or traveling internationally. GVSU Personnel are responsible for the following:

(i) Ensuring their educational, research, and other University activities are conducted properly and in compliance with export control regulations, all requirements of this policy, and any technology control plan on which they are included;

(ii) Ensuring contracts and service agreements entered into on behalf of the University include the appropriate export control language;

(iii) Notifying the Office of Research Compliance and Integrity at least 30 days prior to traveling on behalf of the University to any of the following locations:

(1) Embargoed and/or targeted sanctioned countries identified by the Export Administration Regulations and/or the Office of Foreign Assets Control, and

(2) Prohibited countries identified by the International Traffic in Arms Regulations

(iv) Obtaining pre-approval from the Office of Research Compliance and Integrity to take or ship any University property to an embargoed, targeted sanctioned, and/or prohibited country as defined in (iii) above; and

(v) Ensuring University business is not conducted with any individual or entity on a prohibited party list published by the Departments of Commerce, State, or the Treasury

It is essential that all GVSU Personnel keep current with information and training provided by the University. The Vice Provost for Research and Innovation (VPRI), or designee, is the University's Empowered Official who is responsible for overseeing the University's export compliance program.

The University's Empowered Official or designee, is legally empowered to sign license applications or other requests for approval on behalf of the University and has authority to:

(i) Enquire into any aspect of a proposed export or temporary import by the University,
(ii) Verify the legality of the transaction and the accuracy of the information to be submitted, and
(iii) Refuse to sign any license application or other request for approval without prejudice or other adverse recourse.

For more information about export controls, please contact the Office of Research Compliance and Integrity at 616-331-3197 (https://www.gvsu.edu/export/).