## Wayne State University Export Control Compliance Policy Statement

It is the policy of Wayne State University (WSU) to comply fully and completely with all United States export control laws and regulations. It is WSU's policy that all employees, faculty, visiting scientists, postdoctoral fellows, students, and other persons retained by or working at or for WSU (collectively "WSU Personnel") conduct their affairs in accordance with these laws.

WSU Personnel shall not export any items or technology contrary to U.S. export control laws and regulations. Under these laws and regulations, export is defined as the following: 1) actual shipment of any controlled goods or items; 2) the electronic or digital transmission of any controlled goods, items or technology or services related to controlled goods; 3) any release or disclosure, including verbal disclosures or visual inspections, of any controlled technology, software or technical data to certain foreign nationals<sup>1</sup>; or 4) actual use or application of controlled technology on behalf of or for the benefit of any foreign entity or person regardless of where they are located.

While WSU recognizes the valuable contributions of our foreign researchers and students, there are certain conditions under which the export of information or technology to a foreign national is either prohibited by law or requires license from the U.S. Government. This policy has been enacted to establish, document and implement procedures needed to ensure that WSU, and its Personnel, remain in full compliance with all rules and regulations and specifically those administered by the U.S. Department of Commerce through the Export Administration Regulations, (EAR) <a href="http://www.bis.doc.gov/">http://www.bis.doc.gov/</a>, the U.S. Department of State through the International Trafficking in Arms Regulations, (ITAR) <a href="http://www.pmddtc.state.gov/">http://www.pmddtc.state.gov/</a> and the U.S. Department of Treasury through the Office of Foreign Assets Control (OFAC) <a href="http://www.treas.gov/offices/enforcement/ofac/programs/index.shtml">http://www.treas.gov/offices/enforcement/ofac/programs/index.shtml</a>.

## **Contact Information**

The majority of activities do not require government licenses. Due to the complex nature of these laws, WSU has established an Export Control Office to assist with ensuring compliance with export-control obligations. You are strongly encouraged to call, if you are planning to export materials abroad according to any of the definitions listed above, to engage in international collaborations that will involve the transfer of materials, equipment, or information; have research contact with students or colleagues from any of the countries covered by these regulations; or have any questions about the application of export controls to activities in which you are involved.

Please contact the Export Control Compliance Office at (313) 577-5046 or mail inquiries to Wayne State University, Office of Research Compliance, 5057 Woodward, Suite 2317, Detroit, MI 48202.

<sup>&</sup>lt;sup>1</sup> Per 8 U.S.C. 1324b (a) (3) of the Immigration and Naturalization Act, a foreign national is any person who is not a citizen or Permanent Resident Alien of the U.S.