

Purchasing & Shipping – Export Control

The following provides guidance on processing University of Arizona purchases in accordance with U.S. Export Regulations. Contact Export Control with any questions: export@arizona.edu.

P-Card Purchases under \$10,000

Purchases of equipment, tooling, or services in an amount less than \$10,000 are generally made using University P-Cards. P-card purchases can be made by department personnel (purchaser). P-card purchases do not require prior review by Procurement and Contracting Services (PACS). **The purchaser should take the following steps:**

1. Conduct Visual Compliance screening of a vendor if the purchase is for an export-controlled project.
 - If the screening result is an exact match, stop the purchasing process and forward the results to Export Control.
 - Purchasing from Denied Parties is prohibited unless it is approved by Export Control.
2. Request the export classification - either ECCN or ITAR Category - from the vendor before placing the order for equipment/hardware (item), **if:**
 - The item is for an export-controlled project which has a Technology Control Plan;
 - The item will be shipped or taken outside the U.S., and/or
 - The item has a military or space capability, or is a laser, sensor, infrared camera, or high-performance computer.
3. If placing an order for a vendor to **manufacture** an ITAR controlled article, the vendor is required to complete the ITAR Vendor Certification if one is not already on file.
 - The original ITAR Vendor Certification will be kept on file with the department making the purchase in accordance with record keeping requirements.
 - Notify the department IT personnel to create a Secure Vendor Folder if it is decided to use the secure folder method for transmitting data:
 - A folder within the department IT Secure Vendor Folder will be created with a username and password unique to the vendor.
 - Authorized department IT personnel will e-mail vendor the link.
 - Authorized personnel will telephone the vendor to provide username and password.
 - Optionally, ITAR data and documents may be mailed or given to the vendor via an encrypted USB flash drive, or if hard-copy documents are mailed to the vendor, each page of the document must be marked “**ITAR controlled: do not distribute to non-U.S. persons**” prior to mailing. **At no time should ITAR controlled technical data be emailed to a vendor.**

Requisition Forms - Purchases over \$10,000

Purchases of equipment, tooling, or services in an amount greater than \$10,000 require the department personnel (purchaser) to submit a requisition form to the PACS office.

In addition to the requisition form, purchasers are required to provide three supplier sources. If only one source is available, a Sole Source Verification Form must be submitted. **The purchaser should take the following steps:**

1. Prior to placing an order, the purchaser should reference the UAccess vendor file to verify the vendor has been approved and has an established account. If the vendor is not on the approved vendor's list, a W-9 form must be submitted to PACS to establish an account for the new vendor. PACS will create an account and account number within the university system for the new vendor.
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University Export Control Program
export@arizona.edu
<https://rgw.arizona.edu/compliance/export-control-program>

Shipping and Receiving

1. Export Control should be notified before the export of any items outside the U.S.
 - Items may not be shipped outside of the U.S. until a determination has been made as to whether an export license is required.
 - The shipper shall work with Export Control for assistance.
2. ITAR controlled items and some EAR controlled items will require prior government authorization in the form of a license or exemption before it can be exported.
3. Domestic shipments of export-controlled equipment do not require prior government approval but should be identified as such if ITAR controlled, as described below.
 - If shipping ITAR controlled equipment, the inner packaging of the box or container will be marked **“ITAR CONTROLLED- NO FOREIGN PERSON ACCESS”** and will be placed inside of a secured crate or container for shipping or transporting.
4. Only Export Control can obtain the necessary government approvals and assist in advising the shipper of the required information to be included on the documents.
 - International shipments may require the use of a custom’s broker.
 - All documents related to an export license or exception must be maintained for five years after the expiration date.
 - ITAR controlled items received should be inspected by the UArizona recipient.
 - Shipping documents received should be checked for export classification and requirements.
 - ITAR controlled items should be delivered directly to purchaser or stored in a limited access area until delivered to purchaser.

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