



P-Card Purchases under \$10,000 – 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.

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.**

University Export Control Program
export@arizona.edu
<https://rgw.arizona.edu/compliance/export-control-program>