



MICHIGAN STATE UNIVERSITY

EXPORT CONTROL & TRADE SANCTIONS

EXPORT COMPLIANCE

PROGRAM MANUAL

TABLE OF CONTENTS

| | |
|--|-----------|
| Introduction | 4 |
| Section One: Export Controls in Research Policy Statement | 4 |
| Section Two: Overview of United States Export Control Regulations and Penalties | 6 |
| I. Export Administration Regulations (EAR): | 6 |
| EAR Penalties..... | 7 |
| II. International Traffic in Arms Regulations (ITAR) | 8 |
| ITAR Penalties..... | 8 |
| III. Office of Foreign Assets Control (OFAC) Regulations | 8 |
| OFAC Penalties | 9 |
| IV. Miscellaneous Regulations | 9 |
| Section Three: MSU’s Export Control & Trade Sanctions Program | 9 |
| I. Organizational Chart | 9 |
| II. Research Involving the Export of Items Outside of the U.S. | 10 |
| III. Research Involving “Deemed Exports” to non-U.S. Persons Inside the U.S. | 11 |
| IV. Research Involving Export-Controlled Technology | 11 |
| V. Technology Control Plan | 12 |
| VI. Export Classifications | 12 |
| VII. Travel Outside the U.S. | 13 |
| VIII. Restricted Party Screening | 13 |
| IX. Non-U.S. Persons Visiting or Working in MSU Facilities | 14 |
| X. Recordkeeping and Retention Requirements | 14 |
| Section Four: Intersection with other University Units | 15 |
| I. University Research Organization (URO) | 15 |
| II. Facility for Rare Isotope Beams (FRIB) | 15 |
| III. Environmental Health and Safety (EHS) | 15 |
| IV. Human Research Protection Program | 15 |
| V. Sponsored Programs Administration (SPA) | 16 |
| VI. Innovation Center | 16 |
| VII. University Procurement and Logistics | 16 |
| VIII. Office of International Students and Scholars | 17 |
| IX. MSU IT Information Security | 17 |
| X. Office of General Counsel (OGC) | 17 |
| XI. Office of Audit, Risk and Compliance | 18 |

XII. University Terminology and List of Responsibilities..... 18

Terms and Definitions19

Associated MSU policies.....23

 MSU Information Security Program Plan23

Websites23

 Commerce Department.....24

 State Department.....24

 Treasury Department.....24

Contact.....25

History.....25

Introduction

Export Controls are laws, regulations, sanctions and embargoes imposed by the United States federal government on the dissemination of “controlled” technology to destinations and persons outside of the U.S. (known as an “export”) as well as the disclosure of “controlled” technology to non-U.S. Persons, within the U.S. (known as a “deemed export”). “Controlled” technology may include export controlled physical items, electronic information, technical data, training, consulting, technical services, and even in some cases the prohibited transfer of funds. The Export Control Regulations are intended to protect U.S. foreign policy interests, protect national security, prevent terrorism and the proliferation of weapons of mass destruction, and preserve U.S. economic competitiveness.

Michigan State University’s Export Control and Trade Sanctions Program Manual (“Manual”) describes Michigan State University’s (“University” or “MSU”) Export Control & Trade Sanctions Program. The Manual is intended to be a resource for faculty, staff and students whose work on campus involves responsibility for export compliance. The MSU Export Control & Trade Sanctions (ECTS) program covers all MSU campuses, including regional campuses, and the Manual is intended to be used by all MSU campuses to assist in identifying and managing export control issues and to ensure compliance with export control laws and regulations.

The Manual is intended to provide information and guidance to MSU faculty, students and staff on how to lawfully promote the transfer of technology and sharing of information inside and outside the United States. The Manual contains the MSU policy statement on export controls in research, information about the laws and regulations concerning export controls, explanations of how and when export control issues can arise at MSU, guidance on how export control issues should be identified and addressed, and when the Fundamental Research Exclusion (FRE) applies. At the end of the Manual is a list of definitions, commonly used terms, and a roles and responsibilities matrix.

The Manual is not intended as, and should not be considered, legal advice. Specific questions about export control compliance should be directed to MSU’s Director of Export Control and Trade Sanctions, and Export Control Officer (ECO). Additional information about MSU’s Export Control & Trade Sanctions Program, including a copy of this Manual and contact information for MSU’s Director of ECTS, can be found on the MSU’s [website](#).

Section One: Export Controls in Research Policy Statement

MSU complies with all U.S. export control laws and regulations. MSU requires all University Personnel to comply with the U.S. export control laws and regulations while engaged in activities at or on behalf of the University. MSU’s Vice President for Research has affirmed this policy statement and has also issued a memorandum on guidelines for export controls compliance in research.

MSU is also committed to its longstanding tradition of open academic exchange and its policy of openness in education and research, including the participation of international faculty, students, and staff in research and educational activities. To balance the concerns of openness in research and education with its compliance obligations under the U.S. export control laws, MSU utilizes the exclusions and exceptions in the export control regulations to the fullest extent legally available. One such exclusion is the Fundamental

Research Exclusion (FRE), which states that federally sponsored University research should be unimpeded by export controls unless there are legitimate national security concerns at stake. MSU positions itself so that most of its research is “fundamental” as defined by National Security Decision Directive (NSDD) 189. MSU reviews any project potentially involving export controls to determine whether the project can proceed without any export control restrictions.

To qualify as “fundamental research,” research must be conducted free of any publication restrictions or access or dissemination controls. To safeguard the FRE, MSU will ensure throughout the lifecycle of a fundamental research project that all research results are widely and openly published and made available to the academic community. Any sponsored research project that could potentially involve export controls is flagged for review by processing an Export Control and Open Research Review Worksheet (ECORRW) to ECTS for review. In order to manage export-controlled projects, a Technology Control Plan (TCP) may need to be put in place or an export license may need to be applied for by the Director of ECTS. Even when the FRE applies to a research project, it is important to note that although the results of “fundamental research” are exempt from export controls, the actual item, technology, or software under study is not automatically exempt and may still require an export license and/or a TCP.

All University personnel should be aware of export controls compliance but especially those whose work involves, but is not limited to, the following activities:

- Activities or research in controlled areas (e.g., encryption technology, nuclear technology, chemical/biological weapons, select agents and toxins, military technologies)
- Activities involving the shipping or traveling with equipment, technology, or software internationally
- Activities involving teaching and research collaborations with foreign colleagues or the participation or training of non-US Persons here or abroad.
- Activities involving travel or work outside the U.S.
- Conducting tours with non-US Persons through research areas
- Conducting research sponsored by any entity that restricts publication or participation by non-US Persons
- Activities involving the receipt and/or use of export-controlled information or technologies from other parties
- Collaborations with colleagues located in the OFAC comprehensively embargoed countries

Violations of Export Control laws and regulations must be reported completely and expeditiously. Violations may result in severe criminal and civil penalties for both University Personnel who willingly or knowingly violate the export control regulations and the University itself. MSU requires all University Personnel to contact the Director of ECTS immediately if they suspect any violation of a Technology Control Plan, a license, a license exception, or the export control laws and regulations in general.

Section Two: Overview of United States Export Control Regulations and Penalties

U.S. Export Control laws and regulations control the conditions under which certain items can be transmitted or shipped internationally to anyone (including U.S. citizens and permanent residents) or disclosed, released, or transferred to a non-U.S. Person on U.S. soil (“deemed export”). Under U.S. export control laws and regulations, exports are broadly defined as:

- Shipment of any controlled goods or items
- The electronic or digital transmission of any controlled goods, items or technology or services related to controlled goods
- Any release or disclosure, including oral disclosures or visual inspections, of any controlled technology, software or technical data to non-U.S. Persons
- 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

Failure to comply with export control requirements may result in severe penalties to the University, as well as criminal sanctions to individuals. Individuals working in the following areas, which are most likely to be subject to export controls, should become familiar with those laws and regulations and the procedures described below: engineering; physical and computer sciences (especially when involved in defense-related research); the biological sciences and medicine (including work with select agents and infectious materials); or anyone conducting research or academic collaborations with colleagues in countries that have been designated by the U.S. government as embargoed, sanctioned or as supporting terrorism.

The three primary sources of export control regulation are:

- The U.S. Department of Commerce - Bureau of Industry and Security (BIS), through the Export Administration Regulations (EAR), controls proliferation of some non-military technologies and commercial items that have potential military applications, otherwise known as “dual-use” technology.
- The U.S. Department of State - Directorate of Defense Trade Controls (DDTC), through International Traffic in Arms Regulations (ITAR), controls proliferation of certain military technologies such as weapons, chemical and biological agents, vehicles, missiles, equipment, and satellites.
- The U.S. Department of Treasury - Office of Foreign Assets Control (OFAC), prohibits transactions with countries subject to boycotts, trade sanctions, and embargoes. OFAC may prohibit travel and other activities with embargoed countries and individuals even when ITAR and EAR do not apply.

I. Export Administration Regulations (EAR):

The U.S. Department of Commerce, Bureau of Industry and Security (BIS) issues the Export Administration Regulations (EAR), [15 CFR Parts 730 through 774](#), to implement the Export Administration Act (EAA) and other statutory requirements. Amendments to the EAR are published in the Federal Register. Items subject to the EAR include purely civilian items, "dual-use" items with both civil and military, terrorism or potential

WMD-related applications, and items that are exclusively used for military applications but that do not warrant control under the International Traffic in Arms Regulations (ITAR) (22 CFR parts 120 *et seq.*).

BIS is charged with the development, implementation, and interpretation of U.S. export control policy for items subject to the EAR and maintains the [Commerce Control List \(CCL\)](#), a list of items under the export control jurisdiction of the U.S. Department of Commerce and their Export Control Classification Numbers (ECCNs). The CCL does not include items exclusively controlled for export by another department or agency of the U.S. Government, though in instances where other agencies administer controls over related items, entries in the CCL may contain a reference to such controls.

The BIS is also responsible for the development, implementation, and interpretation of the antiboycott provisions of the EAR, 15 CFR Part 760. The antiboycott provisions discourage, and in some cases, prohibit U.S. persons from participating in foreign boycotts that the United States does not sanction, including complying with certain requests for information designed to verify compliance with the boycott. U.S. persons are also required to report receipt of boycott-related requests. The antiboycott provisions have the effect of preventing U.S. firms from being used to implement foreign policies of other nations that run counter to U.S. policy.

EAR Penalties

Criminal Sanctions for "Willful Violations" of the EAR

- Institution - A fine of up to the greater of \$1,000,000 or five times the value of the exports for each violation.
- Individual - A fine of up to \$250,000 or imprisonment for up to ten years, or both, for each violation.

Criminal Sanctions for "Knowing Violations" of the EAR

- Institution - A fine of up to the greater of \$50,000 or five times the value of the exports for each violation.
- Individual - A fine of up to the greater of \$50,000 or five times the value of the exports or imprisonment for up to five years, or both, for each violation.

Civil (Administrative) Sanctions for violations of the EAR: The imposition of a fine of up to \$12,000 for each violation, except that the fine for violations involving items controlled for national security reasons is up to \$120,000 for each violation. Additionally, for each violation of the EAR any or all of the following may be imposed:

- The denial of export privileges; and/or
- The exclusion from practice before the BIS; and/or
- Seizure/Forfeiture of goods.

II. International Traffic in Arms Regulations (ITAR)

The U.S. Department of State, Directorate of Defense Trade Controls (DDTC), issues the International Traffic in Arms Regulations (ITAR), [22 CFR Parts 120-130](#), to implement the Arms Export Control Act (AECA). Amendments to the ITAR are published in the Federal Register. The AECA confers on the U.S. President the authority to control the export of defense articles and defense services. The President's authority has been delegated to the Secretary of State by executive order, and the DDTC is charged with implementing this authority.

The State Department maintains the [United States Munitions List \(USML\)](#), and the DDTC is charged with controlling exports and (temporary) imports of defense articles and defense services on the USML. The State Department also provides guidance on policy, designation of articles and services on the USML, and issuance of export licenses. Any manufacturer or exporter of articles or services found on the USML is required to register with the DDTC, which helps to validate entities engaged in the defense trade. MSU is registered with the DDTC as an exporter to hold ITAR licenses.

ITAR Penalties

Criminal Sanctions:

- Institution - A fine of up to \$1,000,000 for each violation.
- Individual - A fine of up to \$1,000,000 or up to ten years in prison, or both, for each violation.

Civil Sanctions:

- Institution - A fine of up to \$500,000 for each violation.
- Individual - A fine of up to \$500,000 for each violation.

Additionally, for any violation of the ITAR either or both of the following may be imposed:

- The denial of export privileges; and/or
- Seizure/Forfeiture of goods.

III. Office of Foreign Assets Control (OFAC) Regulations

The US Department of Treasury, Office of Foreign Assets Control (OFAC) administers and enforces economic and trade sanctions based on US foreign policy and national security goals against targeted foreign countries and regimes, terrorists, international narcotics traffickers, those engaged in activities related to the proliferation of weapons of mass destruction, and other threats to the national security, foreign policy or economy of the United States, as set forth in [31 C.F.R. §§ 500-599](#). OFAC enforces trade, anti-terrorism, narcotics, human rights, and other national security- and foreign policy-based sanctions prohibiting the provision of anything of value, either tangible or intangible, to sanctioned countries, organizations, or individuals. The pertinent regulations provide OFAC with broad authority to block or interdict vaguely defined "prohibited transactions" involving restricted destinations or parties. A complete list of [Sanctions Programs and Country Information](#) can be found in the US Department of Treasury online Resource Center.

OFAC Penalties

Criminal Sanctions:

- Institution - A fine of up to \$1,000,000 for each violation.
- Individual - A fine of up to \$1,000,000 or up to ten years in prison, or both, for each violation.

Civil Sanctions:

- Up to \$97,529 per violation against the Trading With the Enemies Act (TWEA)
- Up to \$330,947 per violation involving sanctions programs under the International Emergency Economic Powers Act (IEEPA)
- Up to \$87,361 per violation against the Anti-terrorism and Effective Death Penalty Act (AEDPA)
- Up to \$1,644,396 per violation against the Foreign Narcotics Kingpin Designations Act (FNKDA)

Additionally, for any violation of the OFAC regulations, seizure and forfeiture of goods may result.

IV. Miscellaneous Regulations

There are numerous Export Control Regulations applicable to the University. The Nuclear Regulatory Commission has regulations for nuclear materials and reactors. The Department of Energy has regulations for assistance to foreign nuclear activities. The Department of Defense has regulations to safeguard classified information. When an export control issue arises, MSU's Office of Export Control and Trade Sanctions will analyze all of the regulations to develop an individual management plan for a given situation.

Section Three: MSU's Export Control & Trade Sanctions Program

I. Organizational Chart

MSU's Office of ECTS assists University Personnel with the identification and management of research projects subject to U.S. export control laws. ECTS is part of the [Office of Research Regulatory Support \(ORRS\)](#) and is managed by the Director, Export Control and Trade Sanctions who reports to the Associate Vice President for Research Regulatory Support. (See Figure 1.) The Director, Export Control and Trade Sanctions ("Director of ECTS") has been designated as the University's Empowered Official (EO) for export control purposes.

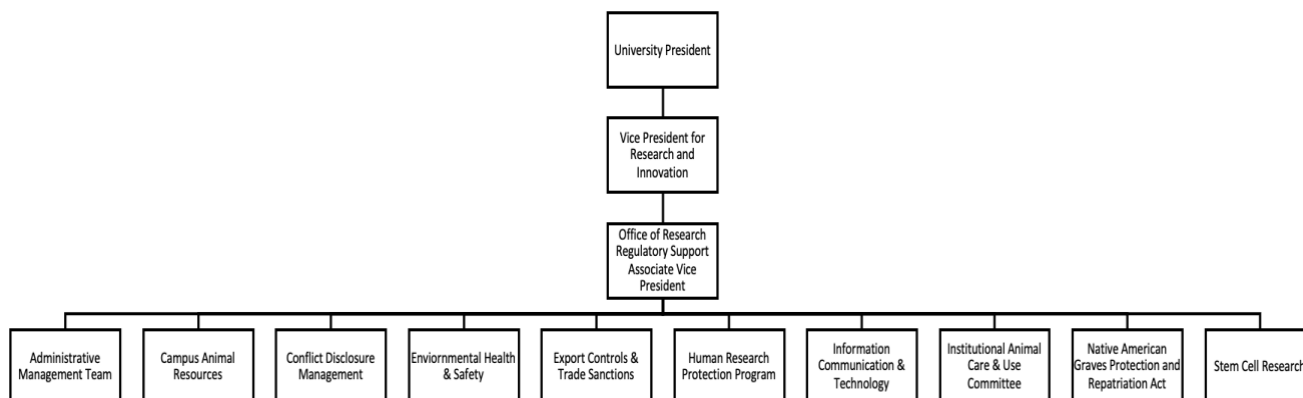


Figure 1. Generalized organization chart of MSU Office of Research and Innovation. (Note: See the MSU Standard Practice Guide (SPG) and [Office of Research and Innovation website](#) for detailed organization charts regarding the University Office of the [President](#) and the [Vice President for Research](#), Office of Research and Innovation Leadership Team.)

II. Research Involving the Export of Items Outside of the U.S.

The Office of ECTS will, upon notice or request, determine the licensing requirements for the export of any item (e.g., data, software, material, or parts/equipment) from the University to destinations outside the U.S. To make this determination, the researcher must provide the following information:

- What is the item? This includes a detailed description (including software, technology, or information), technical specifications, and the origin of the item.
- Are there any contractual non-disclosure or use restrictions with respect to the item or results of research involving the item?
- Has the item been assigned an ECCN classification or USML category, e.g., by the sponsor or provider of the item?
- Where is the item going?
- To whom is the item going?
- What is the intended end-use?
- Is the item published, patented, or in some other manner in the public domain?

Determining the licensing requirements of an item can be a complicated process, requiring the proper classification of the item and verification and clearance of the target destination, end use, and end users. The final determination of whether an item requires a License, qualifies for a License Exemption, or can be exported as “No License Required” will be made by the Director of ECTS and the Principal Investigator. If a License is required, the Director will coordinate the License application process. Obtaining a License can take two to six months (or longer), and there is no guarantee that a License will be issued. No export (or deemed export as discussed further below) may take place until any required License or License Exemption is obtained, or until the Director has reached a “No License Required” determination.

III. Research Involving “Deemed Exports” to non-U.S. Persons Inside the U.S.

The release or transmission of information or technology subject to Export Control regulations to any non-U.S. person within the U.S. is a “Deemed Export” and is considered to be an export to that person’s home country. Examples of “releases” to non-U.S. persons can include providing access to controlled software, technology, or equipment by visual inspection or use, providing access via tours of facilities, providing access to technical specifications, and oral or written exchanges of information. In some instances, a License may be required before the information can be released. It is the responsibility of the Director of ECTS and researcher to determine the licensing requirements involving deemed exports. To make this determination the researcher needs to provide the following information to the Director of ECTS:

- Information to be released – This includes a detailed description of the information, item, software, or technology, technical specifications, origin of the item and/or any contractual non-disclosure or use restrictions that may exist.
- A list of the home country and citizenship of all persons that will be given access to the information, item, software, or technology.
- Origin of the information or item, software, or technology, including whether it resulted from Fundamental Research.
- Whether the item, software, or technology is published, patented, or in some other manner in the public domain.

The final determination whether a “deemed export” requires a License and whether MSU will pursue a License will be made by the Director of ECTS in consultation with the MSU’s Office of General Counsel and the researcher(s). If a License is required, the Director of ECTS will coordinate the License application process. Obtaining a License from the various Departments of the U.S. Government can take several weeks up to six months (or more), and there is no guarantee that a License will be issued. A “deemed export” of information or items to non-U.S. Persons within the U.S. may not occur until the required License is obtained, and researchers should consider this U.S. Governmental timeframe in determining when to initiate their consultations with the Director of ECTS.

IV. Research Involving Export-Controlled Technology

Export controlled items used in MSU research may be received from external parties or may be generated at MSU by [MSU Personnel](#). Before accepting any export-controlled item from an external party, such as the federal government or industry, University Personnel should contact the Director of ECTS for help in determining potential compliance requirements. Depending on the export classification of an item, non-U.S. Persons may or may not be able to have access to an item used in a research project. If a research project involves the receipt or use of externally obtained export-controlled items, such as information, technology, or software, the researcher must work with the Director of ECTS to obtain the classification of the item from the external party. The researcher, with help from MSU’s Office of Human Resources, must also determine the current citizenship status of those [University Personnel](#) who would have access to the export-controlled item. Unless a license is obtained for a non-U.S. Person to have access to an export-controlled item, the researcher must ensure that appropriate safeguards to prevent access by non-U.S. Persons are implemented. The Director of ECTS [and the researcher](#) may also work together to put a Technology Control Plan in place on the project to manage export-controlled technology.

V. Technology Control Plan

If Export Control Regulations apply to a research project, it may be possible to put a Technology Control Plan (TCP) in place instead of applying for an export license. A TCP may also be required if a contract or other agreement contains language restricting the use of non-U.S. Persons or restricting publication such that MSU is not conducting fundamental research. A TCP is a formal document that outlines the procedures that the researcher will implement to prevent export-controlled technology (e.g., physical items, electronic information, software, or hardware) from being accessed by unlicensed non-U.S. Persons. TCPs are developed through the joint efforts of the Director of ECTS and the Principal Investigator and describe the controlled items, the project the items will be used in and the export controls that apply, as well as the physical and information security measures that will be used to manage those items to ensure compliance with the export control regulations.

The TCP must also list the names and citizenship of all University personnel who will have access to the controlled technology. Each individual listed on the TCP will be screened against restricted party lists in Descartes Visual Compliance. Each individual listed on the TCP must complete the export control training for TCP's through MSU's Office of ECTS. TCPs are reviewed by the Director of ECTS and then routed for signatures of the PI, Department Chair, Dean, and all other individuals listed on the TCP. The PI must review the TCP with all project personnel before they begin work on the project. If applicable, the TCP may include a signed certification by the PI and all participating personnel acknowledging that the publication restrictions on this project may adversely affect their ability to publish or complete a thesis/dissertation. The TCP must be amended when, for example, a new person is added to the research team or the scope of work changes. The University will conduct periodic audits of compliance with the TCP.

If it is not possible to manage an export-controlled technology through a TCP, then a License or Technical Assistance Agreement (TAA) may be required. A license is permission from the U.S. government for a non-US Person to have access to export controlled technology. A TAA is an agreement (e.g., contract) amongst companies and organizations governing how and what technical information will be discussed, presented and/or conveyed to foreign nationals in the course of a project controlled under the International Traffic in Arms Regulations (ITAR), such as technical interchange meetings (i.e., PDR, CDR, etc.), joint design work, training, or provision of other assistance. It is important to note that it is not always possible to obtain a License or to develop an appropriate TCP, so there may be some proposed activities that cannot be conducted at MSU. MSU's Empowered Official will make the final decision in such cases.

VI. Export Classifications

Determining whether equipment, materials, products, software or information are export-controlled and fall within the scope of the export control regulations is called an export classification. Export classifications may need to be done for many different reasons, including to determine whether an export-controlled item may be shipped internationally to a specific country or to determine whether a researcher is working with export controlled technology that needs to be protected. If an item has been purchased from a vendor or manufacturer, then the best source of the export classification for the item is to check with the vendor or manufacturer of the item. If the classification cannot be obtained from the vendor or manufacturer, then it will be necessary to consult the Office of ECTS. Determining the correct classification can be challenging, requiring technical knowledge about the item as well as understanding of the export control regulations. Determining whether an item is subject to ITAR or EAR is critical and determining the correct ECCN for

EAR items is very important. Mistakes here can have serious consequences to MSU. The Office of ECTS will work with MSU personnel to conduct export classifications and document them appropriately.

VII. Travel Outside the U.S.

Traveling outside the United States with certain items (e.g., personal laptop computers running encryption software, wireless network hardware/software, some GPS systems) may require a License or License Exception depending on the travel destination. The application of technical experience to situations in other countries (e.g., while presenting at a conference or during teaching or consulting activities) may also invoke export licensing requirements. [University Personnel](#) should obtain assistance from the [Office of ECTS](#) in determining whether a License is required before engaging in such activities. In general, please seek ECTS review prior to travel to countries currently under U.S. embargo, sanction, or other trade restriction. Specific examples include the Crimea, Donetsk, and Luhansk regions of Ukraine, Iran, Cuba, Syria, and North Korea. U.S. sanction programs change over time and the U.S. Department of Treasury maintains the current list of [Sanctioned Countries](#).

All faculty, staff, and students traveling abroad for University-related purposes must register their international travel in MSU's [Global Travel Registry](#), and Concur as applicable, before the expected departure date and update the Global Travel Registry as additional information becomes available or changes occur throughout the duration of the trip, including the addition of other countries to their travel itineraries. International Travel Guidance is available at MSU's Global Safety [website](#). The application of personal knowledge or technical experience to situations in other countries (e.g., during teaching or consulting activities) may also invoke export licensing requirements. University Personnel should obtain assistance from the ECO in determining whether a License is required before engaging in such activities.

While most foreign travel does not require an export license, travel to certain foreign locations may be governed by export control laws. For example, the [U.S. Department of the Treasury](#) regulations restrict the provision of services (even educational services) and certain financial transactions with specific embargoed countries. Also, traveling abroad with certain controlled tangible items, software, technology or information may also require an export license. Individuals traveling to restricted, sanctioned, or embargoed countries are responsible for notifying the Director of ECTS, who will work with the individual to determine whether approval or licenses are necessary. Once outside the US or upon return to the US, individuals' laptops may be subject to search or may be seized without probable cause, suspicion or warrant. It is important that MSU travelers safeguard personal, sensitive, export controlled, and proprietary data appropriately. Please review the international travel safety tips located on [MSU's Office for Global Health, Safety and Security website](#). When preparing for International travel, additional guidance can be found at www.travel.state.gov.

VIII. Restricted Party Screening

The Federal government prohibits U.S. individuals, companies, or organizations from conducting business with "restricted parties" (i.e., persons, entities, or countries subject to U.S. trade sanctions, embargoes, or other restrictions). Lists of restricted parties are issued by many U.S. Government agencies, including the Department of Commerce, Department of State, Department of Treasury, the Federal Bureau of Investigation, and the Department of Homeland Security. Each list includes both U.S. and foreign individuals and organizations.

Restricted Party Screening (RPS) involves searching these lists for names of individuals, entities, and countries. Because the Federal government can impose both civil and criminal penalties for transferring

export-controlled items to or transacting with a restricted party, the MSU's Office of Export Control and Trade Sanctions and units across campus conduct restricted party screening for research sponsors, subcontractors, and vendors before entering into contractual agreements. MSU holds a license to Visual Compliance, a software program that checks all the federal lists simultaneously. Because restricted party screening may be complicated, all University Personnel are required to contact MSU's Office of Export Control and Trade Sanctions before transacting with restricted parties or shipping export controlled items. The Director of ECTS will ensure that all persons known to be involved in a potential transaction have been properly screened.

IX. Non-U.S. Persons Visiting or Working in MSU Facilities

The University has established procedures to monitor visits by or assignments of non-US Persons to its facilities to ensure that the disclosure of, and access to, export-controlled articles and related information are managed appropriately.

Visiting Scholars

Departments, programs, and other academic units of MSU may invite faculty, students, or researchers from other universities as visiting scholar to pursue a program of research during a limited term of residence. Visiting Scholars may have access to certain limited MSU services and resources. The Office of ECTS must review all non-US Persons (who are not degree-seeking students enrolled at the University) who need access to lab with export controlled research before those individuals can be granted Visiting Scholar status.

Non-Immigrant Visa Applicants

In accordance with part 6 of the I-129 Petition for a Nonimmigrant Worker, the University must certify whether or not an H-1B/H-1B1/L-1/O-1A applicant requires an export license. [The Director of ECTS](#) reviews these petitions in coordination with MSU's [Office of International Students and Scholars](#).

Facility or Lab Tours

Researchers who invite non-US Persons to the MSU to tour their facilities and/or labs must confirm their lab does not contain any export-controlled technology. [Please contact the Director of ECTS](#) in advance of the visit to ensure proper screening and export control compliance.

X. Recordkeeping and Retention Requirements

The University is required to maintain a complete record of all export control documentation, including but not limited to Technology Control Plans, Technical Assistance Agreements, the University's export classifications and analysis of license requirements, any issued licenses, shipping documents, and any correspondence related to each export-controlled transaction. Records must be retained for a minimum of five years from the date of export, re-export, or transfer.

The Director of ECTS is responsible for maintaining a central repository of export control records. [Researchers and other University personnel](#) are responsible for forwarding all relevant export control documentation to the Director of ECTS for archiving. ECTS maintains export control records as follows:

- Export control records are maintained electronically in ECTS Dashboard

- Technology Control Plans, Licenses, Technical Assistance Agreements, export classifications, and all related paperwork are maintained in the ECTS Dashboard and related to individual sponsored projects in Quali, as applicable
- Technology Control Plan and License end dates are tracked so that export control files can be closed out and compliance with return/destroy procedures can be appropriately documented.

Section Four: Intersection with other University Units

I. University Research Organization (URO)

MSU's [University Research Organization](#) (URO) was established in 2011 to enable faculty to pursue research in areas of national importance that are challenging or impossible under current MSU policies because of restrictions on publication or citizenship. The URO works closely with ECTS to manage restricted research projects at MSU. Restricted research may sometimes be conducted within the URO's physical space footprint if the research project has access restrictions that prohibit it from being undertaken in an academic unit. Other times, the URO simply coordinates with ECTS to provide training and management of export controlled research projects and personnel. The URO and ECTS work together to manage export controlled research at MSU.

II. Facility for Rare Isotope Beams (FRIB)

The [Facility for Rare Isotope Beams](#) (FRIB) at MSU operates as a user facility for the U.S. Department of Energy Office of Science (DOE-SC), supporting the mission of the DOE-SC Office of Nuclear Physics. FRIB coordinates with ECTS on export compliance and has also developed a comprehensive plan to ensure compliance with the Export Control Regulations. At FRIB, export control compliance is a responsibility shared by all employees, line management, and senior management. FRIB has drafted its own Export Compliance and Trade Sanctions manual, and it has an Export Control Manager within the FRIB Business Support Organization who assists with Export Control Worksheets (for new extramurally funded projects, new employees, and certain classes of visitors), export control licenses or exemption requests and shipment of export control materials.

III. Environmental Health and Safety (EHS)

Export control regulations include provisions for the control of specified biological materials (i.e. pathogens, viruses, bacteria and toxins) chemicals, chemical agent precursors, propellants, explosives, and energetic materials. The controls for these materials differ depending on which regulations control the item. [Environmental Health and Safety](#) (EHS) provides services to the University community to maintain safe and compliant workspaces, including: environmental stewardship (hazardous waste management), laboratory/chemical safety, radiation safety, and biological safety. EHS also provides training in these areas to researchers and their staff, students, and other personnel as appropriate. ECTS works with EHS (and any relevant research safety committees) when potential export control issues are identified through EHS's review of proposed research that utilizes these agents or materials.

IV. Human Research Protection Program

MSU's [Human Research Protection Program](#) (HRPP) has a primary mission to protect individuals who are the subjects of research. MSU is committed to follow the ethical standards described in the Belmont Report, and all applicable federal, state, and local regulations and university policies and procedures. The

HRPP at MSU sets forth the structure, policies, and procedures to implement this mission and commitment. MSU's HRPP has established several Institutional Review Boards (IRB) including the Biomedical and Health IRB and the Social Science, Behavioral, and Education IRB. MSU's IRBs are registered and have a Federal Wide Assurance with the U.S. Office for Human Research Protection. The IRB's review human subjects research and alert ECTS when they identify potential issues with proposed international research, including issues related to export controls. Sponsored research agreements that involve export controls are flagged and ECORRW is processed so that the projects are triaged to ECTS for review.

V. Sponsored Programs Administration (SPA)

[Sponsored Programs Administration](#) (SPA) includes the Office of Sponsored Programs (OSP) that handles the preaward administration for sponsored research at MSU and Contract and Grant Administration (CGA) that handles post award administration. Business Connect (BC) handles preaward administration for industry funding (when not ultimately from a Federal or State funding source). SPA/OSP/BC/CGA collaborate with MSU researchers to provide administration throughout the lifecycle of a grant or contract, including proposal review and submission, the negotiation of an award, and post-award administration. Sponsored programs administrators work closely with the Director of ECTS when they identify a grant or contract with potential export control considerations such as restrictions on participation of foreign nationals or publication restrictions – as these may nullify the Fundamental Research Exemption. When a project is identified as needing ECTS review, SPA works with the MSU faculty member to route an Export Control and Open Research Review Worksheet (ECORRW) to ECTS so that the project can be reviewed by ECTS and appropriately managed.

VI. Innovation Center

MSU's [Innovation Center](#) is the University's hub for creating partnerships that develop economic value and social impact from MSU research. It is dedicated to helping faculty and students translate their discoveries and knowledge into products and services that make life better. The Innovation Center is comprised of MSU Technologies, Business Connect and Spartan Innovations. MSU Technologies facilitates the commercial development and public use of technologies and copyrightable materials developed by MSU faculty and staff. Business Connect helps facilitate research partnerships with corporations. And Spartan Innovations supports student entrepreneurs and faculty start-ups providing many resources to help launch entrepreneurial ventures. MSU's Technologies and Business Connect partner with ECTS to review Non-Disclosure Agreements (NDA's), Material Transfer Agreements (MTA's), Industry contracts, License and Option Agreements and other research-related agreements as needed. MSU Technologies has access to Visual Compliance and runs screening for MTA's and NDA's. Licensees, optionees and industrial sponsors are also screened and export classifications are run on contract subject matter. If any export control issues arise during contract negotiations that necessitate a review, the Director of ECTS is consulted to assist with negotiations, and ECORRW is processed, and appropriate management plans are put in place as needed.

VII. University Procurement and Logistics

[University Procurement and Logistics](#) (UPL) reviews purchase and service agreements for evidence that the equipment to be purchased is subject to export control restrictions or whether contractors are in boycotted countries or on any restricted entity/persons lists. UPL will notify the Director of ECTS when equipment is determined to be export controlled or when other export-related issues are present. The Director of ECTS works with the faculty member purchaser and relevant Chair(s), Dean(s) or other unit

Director(s), as applicable, to ensure that no violation of the U.S. Export rules will occur if the item(s) is purchased for use at MSU, or if the desired contractor provides services to the University. UPL has access to the Descartes Visual Compliance database system to screen vendors in an effort to perform export control due diligence. The Director of ECTS provides Procurement with the necessary training on using Descartes Visual Compliance.

VIII. Office of International Students and Scholars

The [Office of International Students and Scholars](#) (OISS) supports and enhances the educational, cultural, and social experiences of MSU international students and scholars. It serves as a primary link to the University, the community, the federal government, and public and private agencies and organizations. In addition, it provides international and cross-cultural educational programs to MSU. OISS also processes various immigration forms, including the new version of the U.S. Citizenship and Immigration Services' (USCIS) Form I-129, which is mandated for H-1B, H-1B1, L-1, or O-1A workers. USCIS has added two specific questions to the I-129 Petition for a Non-Immigrant Worker relating to compliance with federal export control regulations involving "deemed exports." If such an issue is present, the Director of ECTS conducts a review and it may be necessary to request a license from the Departments of State or Commerce before the foreign national can participate in an Export-Controlled project. The licensing process takes time and may involve a fee, and the request can be denied. Only the Director of ECTS can request a license.

IX. MSU IT Information Security

[MSU IT Information Security](#) works with the campus community to provide a safe computing environment that supports the core missions of MSU. Information Security is primarily responsible for protecting MSU's systems and networks to ensure the confidentiality, integrity, and availability of institutional, academic, and research data. Faculty, students, and staff share with Information Security the responsibility to protect sensitive university data to which they have authorized access. This shared responsibility is especially significant with respect to export controlled research that includes information that is regulated for reasons of national security, foreign policy, anti-terrorism, or non-proliferation. As custodians of such data, faculty and principal investigators are also responsible to comply with all MSU information security and institutional data management policies and procedures as well as applicable laws, statutes, and regulations. These policies apply to University-owned and -managed computers, as well as to sponsor-provided or funded devices used to access export controlled data, software, and equipment.

X. Office of General Counsel (OGC)

MSU's [Office of General Counsel](#) (OGC) provides legal advice and representation to the University through its President, Board of Trustees, and administration on a broad array of legal issues affecting a modern, public research institution. OGC's services include advice and counsel on all matters that have legal significance for the University, including contract review, advice regarding state and federal laws, legal workshops, and educational programs. OGC represents the University with respect to all litigation and supervises all outside legal services provided to the University to assure they meet the highest standards. OGC assists ECTS and provides risk assessments and legal advice as needed, when consulted by the Director of ECTS. MSU also has outside counsel for export controls that it may leverage when needed.

XI. Office of Audit, Risk and Compliance

MSU's [Office of Audit, Risk and Compliance](#) (OARC) supports the University with objective advisory services that assess risk and promote a strong internal control environment. OARC provides risk-based and objective assurance, advice, and insight. OARC serves as a partner to University management and staff to improve business processes and enhance internal controls and compliance mechanisms by reviewing risks, ensuring proper control over University assets and advancing the integrity of operational and financial information. OARC may also perform internal audits of various compliance areas, including the ECTS, and work with the audited programs to follow-up on and resolve outstanding issues.

XII. University Terminology and List of Responsibilities

| Position or Office | List of Responsibilities |
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| Faculty/Researcher/Principal Investigator | <ul style="list-style-type: none">• Identifying research activities in which export control issues might exist.• Notifying the Director of ECTS of identified export control issues.• Working with the Director of ECTS to put technology control plans (TCPs) in place and accurately classify items for licenses.• Informing research team members of any applicable export control requirements, including TCPs pertaining to the project.• Ensuring the appropriate protection and management of all export controlled technology in his or her possession.• Providing all export documentation to the Director of ECTS for archiving. |
| Research Administrators (or any other person preparing research proposals or sponsored research grants or agreements) | <ul style="list-style-type: none">• Answering the export control question(s) in the export control worksheet and providing relevant information to enable a review by the Export Control Officer.• Identifying language in proposals or requests for proposals (RFPs) that attempts to place restrictions on the university's ability to publish the research or to place restrictions on the participation or access by Foreign Nationals.• Notifying the Export Control Officer in the event that such restrictions are identified. |
| Department/College/Unit Director/Dean | <ul style="list-style-type: none">• Signing TCPs on behalf of their faculty members.• Administering and monitoring existing TCPs of their faculty members.• Notifying the Director of ECTS of any issues that arise regarding the implementation of, or compliance with, any TCP. |

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| Director of Export Control and Trade Sanctions (ECTS) | <ul style="list-style-type: none"> • Managing the Office of Export Control and Trade Sanctions • Working with researchers to draft TCPs for review by the ECTS Advisory Group. • Assisting researchers in determining export license requirements (in collaboration with the appropriate regulatory bodies). • Raising issues of concern and elevating them to MSU leadership |
| Position or Office | List of Responsibilities |
| Office of Export Control and Trade Sanctions (ECTS) | <ul style="list-style-type: none"> • Reviewing sponsored research projects, MTA's/NDA's related to export controlled research • Review export controlled procurement purchases • Review MSU sponsored visa's for research at MSU • Coordinate with MSU's Global Travel registry on international travel reviews • Review and approve ECORRW's and determine whether TCP's are needed to manage projects at MSU • Work with faculty to write and manage TCP's • Develop and maintain Export Control policies and procedures. • Recommending program priorities (e.g., for training, etc.). • Conduct risk assessments and monitor MSU's research enterprise for regulatory compliance. |
| Empowered Official (MSU's Director of the Office of Export Control and Trade Sanctions) | <ul style="list-style-type: none"> • Decides when proposed activity cannot be conducted at MSU. • Signs Technology Control Plans and license applications on behalf of MSU. • Accepts liability in connection with ITAR violations. |

Terms and Definitions

| Term | Definition |
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| Commerce Control List (CCL) | A list of items under the export control jurisdiction of the U.S. Department of Commerce. The CCL is divided into ten categories: (0) Nuclear Category Materials, Facilities and Equipment, and Miscellaneous; (1) Materials, Chemicals, "Microorganisms," and Toxins; (2) Materials Processing; (3) Electronics Design, Development and Production; (4) Computers; (5) Telecommunications; (6) Sensors; (7) Navigation and Avionics; (8) Marine; (9) Propulsion Systems, Space Vehicles, and Related Equipment. |

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| Deemed Export | Release or transmission of certain items (e.g., information or technology) subject to export control to a foreign national in the U.S., including graduate students and training fellows. Such a release of information is considered to be an export to the foreign national's home country. |
| Defense Article | Any item designated in the United States Munitions List (USML). Examples include specified chemical agents, cameras designated for military purposes, specified lasers, and GPS equipment. It also means any technical data recorded or stored in any physical form, models, mock-ups, or other items that reveal technical data directly relating to the particular item or "defense article" listed in the USML. |
| Defense Service | The furnishing of assistance (including training) anywhere (whether inside the United States or abroad) to foreign nationals in connection with the design, development, engineering, manufacture, production, assembly, testing, repair, maintenance, modification, operation, demilitarization, destruction, processing, or use of defense articles, as well as the furnishing of any controlled "technical data" (see definition below) to foreign nationals anywhere. |
| Dual-Use | Tangible items, software, and/or technology that have both a civilian and military use. |
| Educational Information | Phrase used by the Department of Commerce in §734.9 of the EAR to denote information that is not subject to the EAR if it is released by instruction in catalog courses and associated teaching laboratories of academic institutions. Certain types of information related to encryption software cannot, however, be considered "educational information" and is subject to the EAR even if released "by instruction in catalog courses and associated teaching laboratories of academic institutions." |
| Empowered Official (EO) | Individual authorized by a business enterprise to sign and process license applications on behalf of the company and who must therefore understand the provisions of ITAR (22 C.F.R. Section 120.25), among others. This individual has authority to inquire into any aspect of a proposed export and to verify the legality and accuracy of the information submitted for a transaction, as well as the authority to refuse to sign "any" license application without retribution from his/her company. This is important because the EO is held liable for any violations of ITAR. The EO is also responsible for internal audit of export control compliance. |
| Encryption | The process of encoding a message so that only the sender and the intended recipient can read it. |
| Encryption Software | Software whose main task is encryption and decryption of data, usually in the form of files on hard drives and removable media, or email messages sent over computer networks or the Internet. |
| End-Use | A detailed description of how the ultimate recipient intends to use the commodities being exported. |
| End-User | The person who receives and ultimately uses the exported or re-exported items. The end-user is not a forwarding agent or intermediary but may be the purchaser or ultimate recipient. |

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| Export | Sending an item (e.g., commodity, software, technology, equipment, or information) from the U.S. to a foreign destination, including the actual shipment of physical goods and documents as well as the transfer of information via email, fax, and internet. Export also includes sharing of information through conversations in person or on the phone, providing technical or training assistance, or making conference presentations. |
| Export Administration Regulations (EAR) | A set of federal regulations that regulates the export and re-export of most commercial items. |
| Export Control Classification Number (ECCN) | A five-character alpha number classification used in the CCL to identify items for export control purposes. ECCNs are found in 15 C.F.R. §774, Supplement 1, and in the Commerce Control List (CCL). |
| Export Controlled Item | Items subject to export control regulations include, but are not limited to, goods, commodities, materials, defense articles, substances, software, technology, equipment, technical data, information, and funds. |
| Export Controlled Activity | Activities subject to export control regulations include, but are not limited to, provision of services, technical assistance, training, software downloads, conference presentations, tours of facilities, travel, collaboration in teaching, or research. |
| Export Controls | Federal regulations that restrict the release of certain items (e.g., commodities, software, technology, equipment, or information) and the provision of certain services (e.g., technical assistance, training) to foreign destinations or to foreign nationals in the United States and abroad for reasons of national security, foreign policy, anti-terrorism, or non-proliferation. Federal export control regulations include the Export Administration Regulations (EAR) and the International Traffic in Arms Regulations (ITAR as well as regulations administered by the Office of Foreign Assets Control (OFAC). |
| Foreign National or Non-U.S. Person | A person who is not a U.S. citizen or lawful permanent resident of the U.S., or who does not have refugee or asylum status in the U.S. Foreign National also includes a foreign corporation, business association, partnership, trust, society, or any other foreign entity or group, as well as international organizations and foreign governments. |
| Fundamental Research | “Fundamental research” is defined by the Department of Commerce as basic and applied research in science and engineering where the resulting information is ordinarily published and shared broadly within the scientific community. The State Department has a similar definition, although it can be interpreted more narrowly. Under the narrower interpretation, “fundamental research” can describe only information and technology that already is in existence and in the public domain. |

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| Fundamental Research Exclusion (FRE) | Excludes research defined as “fundamental research” from export control regulations. The Fundamental Research Exclusion applies only to the dissemination of research data and information, not to the transmission of material goods. The Fundamental Research Exclusion is destroyed if: the university accepts any contract clause that forbids the participation of foreign persons; gives the sponsor a right to approve publications resulting from the research; or otherwise operates to restrict participation in research and/or access to and disclosure of research results. |
| International Traffic in Arms Regulations (ITAR) | A set of federal regulations used primarily to control the import and export of defense articles and defense services. |
| License | A written authorization provided by the appropriate governing regulatory authority detailing the specific terms and conditions under which export or re-export of export-controlled items is allowed. |
| License Exception (EAR) | An authorization that allows the export or re-export, under very specific conditions, of items that would normally require a license under the EAR. Export License Exceptions are detailed in EAR §740 |
| License Exemption (ITAR) | An authorization that allows the export of unclassified defense articles without approval from the Office of Defense Trade Controls. Export License Exemptions are detailed in ITAR § 123.16 |
| Open Meeting | Term used to describe a conference, seminar, or other gathering where all technically qualified members of the public are eligible to attend, and attendees are permitted to take notes or otherwise make a personal record of the proceedings and presentations. |
| Patent Information | Information contained in a patent application, or an amendment, modification, supplement or division of an application. Such information is not subject to the EAR pursuant to §734.10 and §734.7(a) 3. |
| Published Information and Software | Term used to describe information that has become generally accessible to the interested public in any form. Pursuant to EAR §734.7, this type of information is not subject to the EAR. Examples of published information and software include the following: Information published in print or electronic media available for general distribution, information readily available at public or university libraries, and/or Information released at an open conference, meeting, or seminar. |
| Re-export | An actual shipment or transmission of controlled tangible items, software, or information from one foreign country to another foreign country. The export or re-export of controlled, tangible items, software, or information that will transit through a country or countries, or will be unloaded in a country or countries for reloading and shipment to a new country, or are intended for re-export to the new country, are deemed to be exports to the new country. |
| Technical Assistance | Instruction, skills training, working knowledge, and consulting services, as well as the transfer of technical data. |
| Technical Assistance Agreement | An agreement (e.g., contract) for the performance of a defense service(s) or the disclosure of technical data, as opposed to an agreement granting a right or license to manufacture defense articles. |

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| Technical Data | Term used by the State Department to describe information required for the design, development, production, manufacture, assembly, operation, repair, testing, maintenance, or modification of defense articles. Technical data includes information in the form of blueprints, drawings, photographs, plans, instructions, and documentation, as well as information covered by an invention secrecy order or certain kinds of classified information. The term “technical data” can include software directly related to defense articles, but does not include information concerning general scientific, mathematical, or engineering principles commonly taught in schools, colleges and universities. It also does not include information in the public domain or basic marketing information on function or purpose or general system descriptions. |
| Technology | Any specific information and know-how (whether in tangible form – such as models, prototypes, drawings, sketches, diagrams, blueprints, manuals, or software – or in intangible form, such as training or technical services) that is required for the development, production, or use of a good, but not the good itself. |
| United States Munitions List (USML) | List of articles, services, and related technical data designated as defense articles and defense services. The State Department has stated that the USML is illustrative only, meaning that the absence of an item on the USML does not conclusively rule out the possibility of its being a defense article or defense service. |
| University Personnel | Faculty, staff, visiting scholars, postdoctoral fellows, students, and all other persons retained by or working for the University. All University Personnel shall comply with all U.S. export control laws and regulations while engaged in activities at or on behalf of the University. |
| U.S. Person | <i>Under ITAR, 22 CFR 120.15, any person who is a lawful permanent resident as defined by 8 U.S.C. 1101(a)(20) or who is a protected individual as defined by 8 U.S.C. 1324b(a)(3). Also, any corporation, business association, partnership, society, trust, or any other entity, organization or group that is incorporated to do business in the United States. Also, any governmental (federal, state or local) entity. Under EAR, 15 CFR 760.1(b), any person who is a United States resident or national, including individuals, domestic concerns, and "controlled in fact" foreign subsidiaries, affiliates, or other permanent foreign establishments of domestic concerns.</i> |

Associated MSU policies

MSU Information Security Program Plan

- <https://secureit.msu.edu/policy/MSU%20Information%20Security%20Program%20Plan.html>

Websites

Michigan State University Office of Export Control and Trade Sanctions
<https://exportcontrols.msu.edu/>

National Security Decision Directive (NSDD) 189

<http://fas.org/irp/offdocs/nsdd/nsdd-189.htm>

Commerce Department

U.S. Bureau of Industry and Security (BIS)

<http://www.bis.doc.gov>

Export Administration Regulations Database

<https://www.bis.doc.gov/index.php/regulations/export-administration-regulations-ear>

Commerce Control List

<http://www.bis.doc.gov/index.php/regulations/commerce-control-list-ccl>

Denied Persons List

<http://www.bis.doc.gov/dpl/thedeniallist.asp>

Denied Entity List

<http://www.bis.doc.gov/index.php/policy-guidance/lists-of-parties-of-concern/entity-list>

Unverified List

<http://www.bis.doc.gov/index.php/policy-guidance/lists-of-parties-of-concern/unverified-list>

State Department

U.S. State Department – International Traffic in Arms Regulations (ITAR)

https://www.pmddtc.state.gov/ddtc_public?id=ddtc_kb_article_page&sys_id=24d528fddbfc930044f9ff621f961987

The United States Munitions List

<https://www.ecfr.gov/current/title-22/chapter-I/subchapter-M/part-121>

Debarred Parties List

http://pmddtc.state.gov/compliance/debar_intro.html

Excluded Parties List System

<https://www.sam.gov>

Treasury Department

Office of Foreign Assets Control

<http://www.treas.gov/offices/enforcement/ofac/>

Specially Designated Nationals and Blocked Persons List

<https://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx>

OFAC Countries Sanctions Programs
<https://home.treasury.gov/policy-issues/office-of-foreign-assets-control-sanctions-programs-and-information>

Contact

MSU Compliance Hotline:
Anonymous Line: (800) 763-0764 or
Report concerns directly to the Chief Audit, Risk and Compliance Officer at (517) 355-5036.

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