

East Carolina University Export Control Management Plan

In accordance to the ECU Export Control Regulation, the Chancellor, in consultation with the Empowered Official for Export Control (EOEC) at East Carolina University, the appropriate Vice Chancellors and the Chair of the Faculty, as appropriate, appointed and charged the Export Control Advisory Council (ECAC).

The ECAC

The membership of the ECAC¹ consists of ECU faculty, administrators and staff with broad technical and business knowledge in fields that are most germane to export control issues. The Office of the University Attorney will provide legal advice and counsel to the ECAC and the EOEC. A representative from the Office of University Attorney will serve as an *ex officio* member of the ECAC. *Ex officio* members provide information and counsel to the ECAC and do not vote on ECAC matters. The EOEC will serve as Chair of the ECAC and subsequently will appoint replacement members as needed.

Members of the ECAC

- **Division of Administration & Finance**
 - ITCS - Margaret Umphrey
 - HR - Laurie Textor
 - Campus Operations – Wayne Reeves
 - Business Services – Kevin Carraway
 - Financial Services – David Price
- **Division of Research and Graduate Studies**
 - University Research Compliance (Chair) – John Chinn
 - Sponsored Programs – Maryellen O'Brien
 - Technology Transfer – Marti VanScott
 - Graduate School – Paul Gemperline
- **Division of Health Sciences**
 - Brody School of Medicine Office of Compliance – Micki Jernigan
 - Prospective Health – Marian Swinker
- **Division of Academic Affairs**
 - Chris Locklear
- **University Attorney's Office (*Ex officio*)**
 - Paul Zigas
- **Faculty Senate**
 - Brenda Killingworth

The EOEC

The EOEC has overall responsibility for the University's compliance with export control regulation guidance. The EOEC will monitor and review regulations. The EOEC will be responsible for developing and maintaining the official University copy of the Export

¹ Subject to changes in export control regulations, administrative units may be added or deleted from this list.

Management Plan (EMP).

The EOEC will:

1. Develop the PRR applicable to Export Control that are grounded in the federal regulations and involve key stakeholders in PRR development; and
2. Be responsible for implementing, monitoring and managing the EMP.

The EMP

The ECAC will review and advise on the EMP for East Carolina University. ECU recognizes the importance of compliance with all applicable export control regulations in the conduct of university activities. Accordingly this EMP describes steps to:

- Identify export control violation risks through screening,
- Document and monitor exports, and
- Provide export control briefings and training

Identify Export Control Violation Risks Through Screening

To minimize the risk of export control violations, it is necessary to understand where the risks come from and what can be done. The EOCE has identified the follow risks:

- Employees, students, and vendors of ECU may appear on various export control prohibited lists or government debarment lists. Screening of these individuals against these lists will help ECU manage its export control violation risk. Results of the screening of those determined to be an export control risk would be shared with University Legal Counsel and the appropriate University units or officials responsible for oversight. The appropriate University unit will securely maintain the results of the screening. Only University officials with a need to know will have access to the result of the screening. Public request for these records will be referred to University Legal Counsel. Screening of all employees, students, and vendors will be done every 3 years, and annually new employees, students, and vendors would be screened.
- Equipment owned by ECU. A Bureau of Industry and Security Export Control Classification Number (ECCN) will be obtained for ECU equipment. Equipment classified as having an export control risk or potential to be an export control risk (based upon the ECCN) will be identified to those responsible for the equipment so that proper security steps can be implemented.
- Laptops and other personal computers. For international travelers that take computers with their travel, a baggage exclusion or temporary license is available through the EOCE.

Document and monitor exports

Packages shipped to other countries need to be screened and shipping documentation including screening results should be maintained. These two procedures will be performed for all exports:

- Shipments made to foreign countries will be screened for export control prohibitions using eCustoms Visual Compliance, and

- The units doing the shipping and screening will maintain the records of international shipping and screening.

Provide export control briefings and training

The EOEC will provide export control briefing to

- Those who frequently ship international packages,
- Those identified by the EOEC as having an increased export control risk,
- Foreign nationals at ECU as identified by the Office of International Affairs, and
- Those who frequently travel outside the US as identified through travel expenses for foreign travel.