

General Notice: Procurement

University of Pittsburgh



Office of Export Controls Services – EChelp@pitt.edu

To purchase goods/services, University departments should use a University-approved purchase order generated from the University's PantherExpress System. Purchases for less than or equal to \$10,000 (less than or equal to \$100,000 for Delegated Purchasing Units) and using standard University terms and conditions are under the responsibility of department purchasers¹. For more information about procurement procedures, please consult the [PantherExpress webpage](#).

For purchases valued at greater than \$10,000 (or over \$100,000 for Delegated Purchasing Units) or those not made using the University's standard terms and conditions, the following schools/departments will be asked to obtain the **Export Controls classification** of each good/service listed on the purchase requisition²:

- **NATURAL SCIENCES division* of the Dietrich School of Arts and Sciences (excludes all other divisions);**

*Natural Sciences Division includes: *Actuarial Mathematics, Applied Mathematics, Applied Statistics, Astronomy, Bioinformatics, Biological Sciences, Chemistry, Computer Engineering, Computer Science, Ecology and Evolution, Environmental Geology, Environmental Studies, Geographic Information Systems, Geology, Geology and Planetary Science, Intelligent Systems, Life Sciences Research, Mathematical Biology, Mathematics, Mathematics Professional Program, Mathematics-Economics, Microbiology, Molecular Biology, Molecular Biophysics and Structural Biology, Nanoscience and Engineering, Neuroscience, Photonics, Physics, Physics and Astronomy, Psychology, Statistics.*

- **SWANSON SCHOOL OF ENGINEERING; and,**
- **SCHOOL OF INFORMATION SCIENCES.**

Note that, per 15 CFR 758.3, it is the developer/manufacturer's obligation to provide the export controls classification of their products to the University.

If the supplier informs the University that an item is classified under a ***U.S. Munitions List (USML) category***, i.e. is subject to the International Traffic in Arms Regulations (ITAR – administered by DDTC under the Department of State), University Purchasing Services personnel will contact the [Office of Export Controls Services \(OEC\)](#) prior to proceeding with the purchase. The same procedure will apply to items controlled by the Department of Energy – Nuclear Regulatory Commission (NRC) and the Homeland Security - Bureau of Alcohol, Tobacco, Firearms and Explosives (BATFE). **Note that items falling under such classifications may not be accessed by foreign nationals without an authorization from the relevant U.S. Federal agency. Please secure the item and notify the [OEC \(EChelp@pitt.edu\)](#) immediately.**

If, however, the supplier informs the University that an item is classified under an ***Export Control Classification Number (ECCN)***, i.e. is subject to the Export Administration Regulations (EAR – administered by BIS under the Department of Commerce), University Purchasing Services personnel should contact the [OEC](#) only in the following cases:

- Item is purchased to be exported out of the United States; and/or,
- Item is an EAR-controlled items with nx6nn (600 series) classification; and/or,
- Supplier notifies the University personnel of specific export controls restrictions on the item.

¹ Updated guidance for items less than \$5000 purchased using a PCARD:
<http://cfo.pitt.edu/pexpress/payments/pCard.php>

² See "*Checklist: Requisition and Supporting Documentation Requirements*" = documents to be submitted electronically to Purchasing Services via PRISM. For obtaining the Export Controls classification of the products, please use the form called **Product Classification Certification**.

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Note that items classified by the supplier as **EAR99** can be exported to all countries, **except embargoed countries** (Crimea – Region of Ukraine, Cuba, Iran, North Korea, Sudan and Syria), without contacting the [OEC](#).

If the supplier indicates that the item is “*publicly available*” or in the “*public domain*”, this signifies that the item is not subject to the export regulations. Contacting the OEC is not necessary if the item is to be later imported or exported.

The University department requesting the purchase and University Purchasing Services personnel should keep the Export Controls classifications of the items being purchased, in case of future exports out of the U.S.

In cases where the supplier does not know the export controls status of an item or cannot provide it, the OEC will review and identify any “Red Flags” or areas of concern. In cases where there is anything suspicious or unclear about the transaction, University Purchasing Services personnel and the OEC staff will work together to evaluate these “Red Flags” before completing the transaction. In cases where an Export Controls Statement/Notice and/or an End-User Certification is included with the quote, purchase order, or the shipped items, please send it to the [OEC](#) prior to completing/signing it.

Export License. It takes approximately six to eight weeks to obtain an Export License (official authorization) from the U.S. Government. Therefore, please contact the OEC with as much advance notice as possible.

Documentations/records. Export authorizations and export documents must be kept for five years from their date of expiration.

Learn more. Consult the Office of Export Controls Services website: <http://www.export.pitt.edu>

Training. CITI Export Controls modules: <http://www.citi.pitt.edu/citi/>.

Get Help. EChelp@pitt.edu

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