Quarterly Principal Investigators Meeting
May 15, 2018
Introductions
Relationship between good ethics and good compliance

1. Doing nothing is usually compliant but not necessarily ethical
2. Good ethics can justify non-compliance; good compliance cannot justify unethical behavior
3. Ethics applies to everyone, compliance doesn’t
4. Ethical arguments speak to deep rooted human emotions – the rest of the world doesn’t give a crap about “the legal codes” or your compliance rules when they judge you.
5. You are going to have to be able to argue like a human and think like a regular human when you are addressing these issues.
Dumb Things About Ethics and Research

1: Research has no promotional aims

- Any activity that can be expected to benefit the campus is promotional, we always expect benefits to the University or else why would we do it? Therefore everything we do is promotional really (we just pretend it isn’t)

2: I am compliant = I am ethical

- Compliance comes from basic human ethical principals.
- Don’t say “Is this compliant?” Say “Is this ethical? Is this moral?”

3: There are too many grey areas

- We need more guidance.
- We need to be able to justify what we do.

4: Neanderthal (Homo Sapiens Neanderthalensis)
Things we should already know

• Do not promote to the public any questionable practices.
• Do not promote your research outside the award terms and conditions.
• Get comfortable in being transparent about your research as needed.
• Do not tell fibs.
• Do be able to justify your actions ethically not just from compliance point of view.
Recent Audit Findings

- **Compensated Effort**: We are doing away with the current “effort reporting” process that is posted on our website effective immediately. We will be releasing a brand new website that outlines how we will process compensated effort payments. All faculty and personnel involved in processing compensation to faculty for additional effort should note that we are required to use job code 2403 for overload pay. This is an internal control mechanism to mitigate the risk of faculty exceed the CSU 125% salary cap. As it stands the setting internal controls in place lies with Academic Affairs and various departments and schools within. Accounting and Finance plays a limited role along with Risk Management. We are developing a process that is streamlined and does not require an onerous amount of forms.

- **Subrecipient Monitoring**: This is required for federal awards only and begins at the proposal stage. If you are submitting a proposal and know that subawards are involved please reference our current subrecipient policy. The four documents below are samples tools we use to monitor each subaward. Please note the Risk Assessment Matrix.

- **Conflict of Interest Training**: Every two years faculty must take the conflict of interest training. We have notified all personnel within ORSP to double check with the compliance office prior to award orientation to ensure new faculty take the training before award orientation. This requirement will also be reflected on the new website.

- **Award Closeout**: It is very important that all charges the belong to a grant are charged in a timely manner and as soon as possible. Do not try make any last minute purchases towards the end the award as this will trigger auditors to inspect. Do not try to move salaries around either as these are are red flag warnings for auditors. The closeout policy is currently on our website and will also be available on our new website. Please do all you can to close your awards out in a timely fashion and avoid no cost extensions.
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Recent Audit Findings

Subrecipient Monitoring Report Due

CSUEB Subrecipient Monitoring Report
Form for Principal Investigators to maintain a record of subrecipient monitoring actions. This report is due to ORSP by January 31st of the year preceding the period of performance for each subrecipient.

<table>
<thead>
<tr>
<th>CSU East Bay University</th>
<th>Subrecipient</th>
</tr>
</thead>
<tbody>
<tr>
<td>PI Name:</td>
<td>Subrecipient Institution:</td>
</tr>
<tr>
<td>CSUEB Fund#:</td>
<td>Subrecipient PI:</td>
</tr>
<tr>
<td>Subcontract #:</td>
<td>Subrecipient Contact:</td>
</tr>
<tr>
<td>Period of Performance:</td>
<td>Invoicing Frequency: Monthly Quarterly Other</td>
</tr>
</tbody>
</table>

Name and position of the person responsible for overseeing this record

Scheduled subrecipient reporting dates for deliverables (based on the terms of the grant award)

<table>
<thead>
<tr>
<th>DATE</th>
<th>COMMENTS</th>
<th>ACTUAL DATE</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Data entered as each report is submitted

Informal Progress Reports completed by subrecipients (these should generally take place at least quarterly)

<table>
<thead>
<tr>
<th>DATE</th>
<th>METHOD</th>
<th>COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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</tbody>
</table>

Other Communications

<table>
<thead>
<tr>
<th>DATE</th>
<th>METHOD</th>
<th>COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Signature of person responsible __________________________ Date: __________

Signature of PI (if different) __________________________ Date: __________
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• **Conflict of Interest Training**: Every two years faculty must take the conflict of interest training. We have notified all personnel within ORSP to double check with the compliance office prior to award orientation to ensure new faculty take the training before award orientation. This requirement will also be reflected on the new website.
How do we resolve these?

• What are we as a campus ready to do to resolve these findings?
• Are we as a campus ready to resolve these findings from an ethical point of view (not just compliance)?
• ORSP is willing to lead the efforts to help resolve these findings using an ethical approach however; without assistance and cooperation from the campus community (Faculty, Senior level administrators, regular administrators, students, etc.) we will not be able to full resolve these issues.
• ORSP is aware that solving these problems will significantly improve the research culture of the campus and make work a lot easier for everyone in the long run.
ORSP – Office Of Ethics and Compliance

• We are here to help the faculty be competitive in their research. We believe every challenge is an opportunity for the campus to promote the great work being done. We want to equip our faculty to compete globally by providing educational support/training (if possible) and make all parties aware of any potential legal matters that may impact their activities.
Updates

Faculty Support Grants
No word on Research, Scholarship and Creative Activities (RSCA) funding from the Chancellor’s office that support the Faculty Support Grants at East Bay.

If we have funds for FSG’s, we’ll have a competition early in the Fall 2018 semester.

Check the Academic Affairs Newsletter this summer for updates.
ORSP Faculty Research Seminar
Wednesday May 16, 11:30-1:00, Biella Room

Speakers:
Dr. Jean Moran (Earth and Environmental Sciences)
Dr. Michelle Rippy (Criminal Justice Administration)
VPAT Approvals for Grant-Funded Activities

Be sure to indicate that the purchase is related to a grant

Requestor Information

Intended user and/or administrator that is most knowledgeable about the product

Requestor Name *

Elmer Fudd

Requestor Email *

elmer.fudd@csueastbay.edu

Department, Program, Office, or Committee requesting acquisition *

Department of Rhetoric

What is the funding source of this acquisition? *

Grant-Funded (Office of Research & Sponsored Programs)

NEXT

Never submit passwords through Google Forms.
Be sure to indicate that the equipment or software will be used in a restricted environment.

Don’t list students as anticipated users (if appropriate).
VPAT Approvals for Grant-Funded Activities

Since the purchase is grant/research related, this option might be best.

Don’t overestimate the number of anticipated users

Don’t indicate that the use of the product will be expanded unless you have clear plans

We are working to get more options for this question.
Vivarium opens for research in June!
F. Michael Chua Won First Prize Category Business, Economics, & Public Administration

Cal State East Bay Hosts Competition 2020
Financial Year-End Deadlines

Fri, May 11, 2018 - Purchase Requisitions less than $5,000. Close out purchase orders; encumbrance adjustments.

Fri, May 25, 2018 - Purchase Requisitions after this date will be dated July 1, 2018.

Fri, June 1, 2018 - Submit STLS Forms, Check Requests, Travel Claims, Faculty Release/Payment requests, expenditure transfers and payroll adjustments. Requests after this date will be processed as time permits.

Wed, June 6, 2018 – 17-18 Duplicating Services requests
Faculty Additional Compensation from Grant Funds

Online Overload/Additional Compensation form:
https://goo.gl/forms/b4ddZn47qNqMAUWn1

Link at the bottom of every Monthly Financial Report you receive

- Payment Recipient Name and Department
- Dates to be paid
- Amount
- Project Name
- Principal Investigator’s Name
Overload/Additional Compensation Request

Please provide and submit the following information, and email orsp@csueastbay.edu once you have done so.

Payment Recipient's First Name & Last Name

Payee's Home (Full-Time) Department and Home (Full-Time) Dept ID

Period to be paid (month, year to month, year)

Amount to be paid

Project Name
Travel Claims

• Itemized receipts are mandatory for reimbursement of any expense greater or equal to $75
• Lunches and incidentals can only be claimed if travel is 24 hours or more
• Be sure to select the appropriate Account code
• Be sure to list the Fund/Project to charge expense to
**Travel Claims**

**Employee Payment Request**

To display the request form, please select your payment type.

- Travel Expense Claim
- Travel Advance
- Hospitality Expense Claim
- Other Reimbursements

**Claimant's Name**: [Name]

**NetID**: [NetID]

**Payee Name (if different than claimant)**: [Name]

**Department**: [Department]

**Mailing Address (Street, City, State, Zip Code)**: 123 Main St, Anytown, CA 90210

**Phone**: [Phone Number]

**Normal Work Days**: [Number]

**Normal Work Hours**: [Hours]

**If claiming**: [Yes/No]

**Vehicle License**: [License Number]

**Purchased by University (includes CSUEB Travel Card)**

<table>
<thead>
<tr>
<th>Date</th>
<th>Time (24 hours, 12:00 AM)</th>
<th>Location(s) of Expense</th>
<th>Lodging Daily Charges</th>
<th>Meals</th>
<th>Airfare &amp; Bag Fees</th>
<th>Rental Car &amp; Fuel</th>
<th>Tax, Tolls, Shuttle, Parking</th>
<th>Registration Fee</th>
<th>Other Business Expenses</th>
<th>Total Expenses</th>
</tr>
</thead>
<tbody>
<tr>
<td>5/1/18</td>
<td></td>
<td>Hayward, CA</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>$500.00</td>
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<td>+ -</td>
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<td></td>
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<td></td>
<td></td>
<td></td>
<td>$500.00</td>
</tr>
<tr>
<td><strong>Subtotals</strong>:</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>$550.00</td>
</tr>
</tbody>
</table>

**Advance to / Purchased by Employees**

- [Click for Defensive Driving Training Login and Form STD261]

<table>
<thead>
<tr>
<th>Date</th>
<th>Time (24 hours, 12:00 AM)</th>
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<th>Registration Fee</th>
<th>Other Business Expenses</th>
<th>Total Expenses</th>
</tr>
</thead>
<tbody>
<tr>
<td>5/5/18</td>
<td>8:00</td>
<td>Hayward/Portland</td>
<td>226.00</td>
<td>15.66</td>
<td>23.99</td>
<td>250.00</td>
<td></td>
<td>20.00</td>
<td></td>
<td>526.55</td>
</tr>
<tr>
<td>5/6/18</td>
<td>17:00</td>
<td>Portland, Oregon</td>
<td>226.00</td>
<td>21.92</td>
<td>7.00</td>
<td></td>
<td></td>
<td>20.00</td>
<td></td>
<td>254.92</td>
</tr>
<tr>
<td>+ -</td>
<td></td>
<td>Hayward/Portland</td>
<td>226.00</td>
<td>15.66</td>
<td>23.99</td>
<td>250.00</td>
<td></td>
<td>20.00</td>
<td></td>
<td>526.55</td>
</tr>
<tr>
<td><strong>Subtotals</strong>:</td>
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<td></td>
<td>452.00</td>
<td>31.58</td>
<td>40.95</td>
<td>500.00</td>
<td></td>
<td>40.00</td>
<td></td>
<td>822.19</td>
</tr>
</tbody>
</table>

**Attended ABC Conference on 5/6/18 to learn more about XYZ topics related to the grant. Breakfast and Lunch provided by conference.**

**Purpose/Remarks**: [Details]

**Cost Distribution**

- Is this an expense to be paid by Foundation ("W" Fund)? [Yes/No]

<table>
<thead>
<tr>
<th>Account</th>
<th>Fund</th>
<th>DeptID</th>
<th>Program</th>
<th>Class</th>
<th>Project</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>600001 Travel-In State</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>W1234</td>
<td><strong>$500.00</strong></td>
</tr>
<tr>
<td>600002 Travel-Out of State</td>
<td></td>
<td>13200</td>
<td></td>
<td></td>
<td>W123400</td>
<td><strong>$822.19</strong></td>
</tr>
<tr>
<td>+ - Total (For Travel Expense Claim, must match the amount advanced to / purchased by employee; For all others, must match total claim):</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>$822.19</strong></td>
</tr>
</tbody>
</table>

**Additional Notes**

- Attach appropriate receipts and submit approved form to Accounts Payable SA2750.

- Receipts need to be taped to an 8 1/2 x 11 piece of paper.
Please turn in for staff time on grants in FY18-19 (charge Periods starting 7/1/18)
Upcoming Items

- Participant incentives for CSUEB Students (up to $25 Bay Card credit)

- Electronic Routing Process for Proposal Review and Approval
No Overhead allowed on your proposal?

No problem! ORSP follows the sponsors restrictions regarding Indirect costs. ORSP is committed to assisting you apply for your grant even if there is zero IDC.
Intent to Submit an Application to an External Sponsor

- The earlier the better
- Prompts our office to send you your application timeline.
- Helps our office prepare internal forms and compliance documents
- Provides us with valuable information about your project and points us to the sponsors guidelines for review.
Data Warehouse Training

• Ever wonder what those monthly reports actually say?
• Curious about how much money you’ve spent so far?

• Chantal is hosting a training May 22\textsuperscript{nd} 2-4pm in SA1400
• Please email me if you plan to attend so I can request access to the dashboard.
• **California Humanities**
  - Quick Grants: $1,000 & $5000 will be awarded for small scale humanities activities and projects
    - Deadline: June 15 and October 15, 2018
  - Project Grants: $10,000 to $20,000
    - Deadline: August 1, 2018
  - The California Documentary Project
    - Research and Development; Up to $10,000
    - Production Grants: Up to $50,000

• **NEH Summer Stipends - notify ORSP by July 1, 2018**
  - $6,000 for two consecutive months of full-time research and writing

• **NSF Major Research Instrumentation Program (MRI) – notify ORSP by Sept. 1, 2018**
  - Track 1: Track 1 MRI proposals are those that request funds from NSF greater than or equal to $100,000 and less than $1,000,000.
  - Track 2: Track 2 MRI proposals are those that request funds from NSF greater than or equal to $1,000,000 up to and including $4,000,000.
Export Compliance Part 2
When Do Export Controls Apply?

- Export controls apply if the information/materials appear on either the International Traffic in Arms Regulations, known as ITAR Munitions List or the Export Administration Regulations, referred to as EAR, Commerce Control List.

- ITAR places strict controls on the export of “defense articles” and “defense services.” Defense articles include any item or technical data on the United States Munitions List (USML), and defense services include the furnishing of assistance to foreign persons, whether or not in the United States, with respect to defense articles, and the furnishing of any technical data associated with a defense article.

- There are exclusions that cover work performed in academic institutions and a license is not required to disseminate information if an exclusion applies.
Decision trees are often used to determine whether there is an export control issue. This tree begins with a focus on data and whether
Other decision trees focus on the nature of the commodity.
Definitions

“U.S. Person” is defined by ITAR 22 CFR §120.15 as:
A person who is a **lawful permanent resident** or who is a protected individual. It also means any corporation, business association, partnership, society, trust, or any other entity, organization, or group that is incorporated to do business in the United States. It also includes any governmental (federal, state, or local) entity. It does not include any foreign person as defined in section ITAR 120.16 below.

“Foreign Person” is defined by ITAR 22 CFR §120.16 as:
Any natural person who is **not a lawful permanent resident** as defined by 8 USC. 1101(a)(20) or who is not a protected individual as defined by 8 USC. 1324b(a)(3). It also means any foreign corporation, business association, partnership, trust, society, or any other entity or group that is not incorporated or organized to do business in the United States, as well as international organizations, foreign governments, and any agency or subdivision of foreign governments (e.g. diplomatic missions).
“Technical Data” is defined by ITAR 22 CFR §120.10 as:

Information, other than software as defined in ITAR 120.10(4), which is required for the design, development, production, manufacture, assembly, operation, repair, testing, maintenance, or modification of defense articles. This includes information in the form of blueprints, drawings, photographs, plans, instructions, and documentation.

This definition does not include information concerning general scientific, mathematical, or engineering principles commonly taught in schools, colleges, and universities or information in the public domain as defined in 120.11. It also does not include basic marketing information on function or purpose or general system descriptions of defense articles.

Most of university teaching and research falls under one, or more, of several exemptions
Examples of technical data include:

- Classified information relating to defense articles and defense services
- Information covered by an invention secrecy order
- Software as defined in ITAR 121.8(f) directly related to defense articles

*Technical Data*” defined by EAR 15 CFR §772:
May take forms such as blueprints, plans, diagrams, models, formulae, tables, engineering designs and specifications, manuals, and instructions written or recorded on other media or devices such as disk, tape, or read-only memories.
**Definitions (Continued)**

Export is defined in ITAR 22 CFR §120.17 as:

- **Sending or taking** a defense article out of the United States in any manner, except by mere travel outside of the United States by a person whose personal knowledge includes technical data

- **Transferring registration, control, or ownership** to a foreign person of any aircraft vessel, or satellite covered by the U.S. Munitions List, whether in the United States or abroad

- **Disclosing** (including oral or visual disclosure) or transferring in the United States any defense article to an embassy, any agency or subdivision of a foreign government (e.g., diplomatic missions)

- **Disclosing** (including oral or visual disclosure) or transferring technical data to a foreign person, whether in the United States or abroad

- **Performing a defense service** on behalf of, or for the benefit of, a foreign person, whether in the United States or abroad

Export is defined by EAR 15 CFR §734.2(b) as:

- An actual shipment or transmission of items subject to the EAR out of the United States, or release of technology or software subject to the EAR to a foreign national in the United States, as described in paragraph (b)(2)(ii) of the EAR, and paragraph (b)(9) for exports of encryption source code and object code software subject to the EAR.
Exclusions Applicable to Universities

- Fundamental Research
- Public Domain
- Educational Information
- Employment
Fundamental Research Exclusion

Fundamental research is defined in the EAR and ITAR as

- Basic and applied research in science and engineering where the resulting information is ordinarily published and shared broadly within the scientific community
- University research will not be considered fundamental research if:
  1. The University or its researchers accept restrictions on publication of scientific and technical information resulting from the project or activity, or
  2. The research is funded by the U.S. Government and specific access and dissemination controls apply.
- Foreign nationals may participate in research projects involving export-controlled information on campus in the US only, provided foreign person is not restricted by OFAC
- Transfer of export-controlled information including “Materials” or “Items” abroad, even to research collaborators, is still prohibited
Other Exclusions (Continued)

Information that is in the **Public Domain** is not subject to export controls (ITAR) and (EAR) if already published through
(a) Libraries open to the public, including most University libraries
(b) Unrestricted subscriptions; news-stands, or bookstores
(c) Published patents
(d) Conferences, meeting minutes seminars, trade shows, or exhibits held in the US (ITAR) or anywhere (EAR) which are generally accessible to the public for a fee and without the hosts’ knowledge of or control of who visits or downloads software/information

**Educational Exclusion** from EAR and ITAR
- Covers teaching to foreign nationals in the US or abroad general science, math, and engineering commonly taught in schools and Universities in formal course and in teaching laboratories of academic institutions - including information related to controlled Material or items
- Does not cover controlled information conveyed outside the classroom or teaching lab of an academic institution
Other Exclusions (Cont.)

- **Employment exclusion may apply to individuals who:**
  - (a) are full-time, bona fide university employees
  - (b) have permanent addresses in the U.S. while employed
  - (c) who are not nationals of embargoed or sanctioned countries
  - [http://www.treas.gov/offices/enforcement/ofac/programs/](http://www.treas.gov/offices/enforcement/ofac/programs/)
  - And,
  - (d) are advised in writing not to share controlled information with other foreign persons

- **Such persons are not considered foreign nationals under the ITAR**
CSUEB Policy

- All Cal State East Bay employees and students involved with a potential export must:
  - Be aware of and comply with all policies, procedures, laws, and regulations concerning Export/Import activities
  - Ensure that no controlled information or equipment is shipped outside the United States except with a license from the Department of State and utilizing an approved carrier (unless an exclusion applies, such as for a laptop computer used for fundamental research and under owner's control at all times)
  - Always determine nationality of all collaborators, who they work for, and where they are located, before engaging in any controlled activity

It is the responsibility of staff and faculty to ensure student compliance
Policy (Continued)

• Ensure NO shipments are made to a country subject to OFAC sanctions or embargoes

• Not take chances or make assumptions, but consult with the Grants Development Office before engaging in Export/Import activities

• Seek to protect the fundamental research exemption by negotiating the elimination of clauses that restrict

  ✧ Publication
  ✧ Access
  ✧ Participation in research, teaching, or disclosure of results
Question

Giving facility tours to students or employees of a foreign country may constitute an export. True or False?

○ TRUE
○ FALSE

5/9/18
Answer

Giving facility tours to students or employees of a foreign country may constitute an export. True or False?

✓ TRUE
○ FALSE

Giving facility tours to students or employees of a foreign country may constitute an export. Have your specific situation reviewed by the Grants Development Office.

Ensure tours do not contain access to areas that contain export controlled material or technologies.
Question

Once a license is obtained for exporting certain equipment, and all of the equipment on the license has been exported, there is no need to obtain additional licensing authority to export the same equipment in the future. True or False?

○ TRUE
○ FALSE
Answer

Once a license is obtained for exporting certain equipment, and all of the equipment on the license has been exported, there is no need to obtain additional licensing authority to export the same equipment in the future. True or False?

○ TRUE
✓ FALSE

Each situation must be reviewed by the department of state licensing authority even if you intend to export the same equipment in the future.
Question

You teach a graduate course on solid-state lasers which is listed in our course catalog. Many of the students are foreign persons. You need to obtain a license before this information is disclosed to foreign students?

○ TRUE
○ FALSE
Answer

You teach a graduate course on solid-state lasers which is listed in our course catalog. Many of the students are foreign persons. You need to obtain a license before this information is disclosed to foreign students?

○ TRUE
✓ FALSE

Release of information by instruction in catalog courses and course laboratories of academic institutions is not subject to EAR
Question

You are traveling abroad to Germany as part of a Grant activity. Since it is not an embargoed country there are no restrictions on your travel.

○ TRUE
○ FALSE
You are traveling abroad to Germany as part of a Grant activity. Since it is not an embargoed country there are no restrictions on your travel.

○ TRUE
✓ FALSE

All faculty, staff and students traveling abroad must ensure no encrypted software exists on your laptop, PDA or cell phone and that these items are used as tools of the trade only.
Export Compliance Next Steps
1. Online decision tree
2. Visual Compliance workshop
Questions and Comments?