



The Texas A&M University System  
The Texas A&M Engineering Extension Service

## Standard Administrative Procedure

### 15.02.99.N1.01 – Export Management and Compliance Program (EMCP)

Approved: December 1, 2009

Revised: October 19, 2018

Next Scheduled Review: October 19, 2023

#### Summary

This document provides an overview of important fundamentals of export control issues and establish an agency EMCP that provides reasonable and prudent procedures, guidelines, safeguards, and compliance measures throughout the export process in order to reduce the risk of export control violations.

#### Definitions

These key definitions and terms have been extracted from multiple export control and regulatory sources, e.g., the ITAR, EAR, OFAC controlling authorities and TAMUS policy.

**Commerce Control List (CCL)** A list of items that are export controlled under the jurisdiction of the EAR segregated into ten major categories (Category 0-9). Each category is subdivided into five product groups (A-E). The CCL category number and product group letter comprise the first two alpha numeric characters of the Equipment Control Classification Number (ECCN).

**Commodity** Any article, material, or supply except technology and software. Note: the provisions of the EAR applicable to the control of software, e.g., publicly available provisions, are not applicable to encryption software. Encryption software is controlled because, like the items controlled under ECCN 5A002, it has a functional capacity to encrypt information on a computer system and not because of any informational or theoretical value that such software may reflect, contain, or represent, or that its export may convey to others abroad.

**Controlled Country** A list of countries designated controlled for national security purposes under authority delegated to the U.S. Secretary of Commerce by an Executive Order. Country Group D:1 includes Albania, Armenia, Azerbaijan, Belarus, Bulgaria, Cambodia, the People's Republic of China, Estonia, Georgia, Kazakhstan, Kyrgyzstan, Laos, Latvia, Lithuania, Moldova, Mongolia, Romania, Tajikistan, Turkmenistan, Ukraine, Uzbekistan, and Vietnam. Cuba and North Korea are controlled countries; however, they are listed in Country Group E:2 (unilateral embargoes) rather than Country Group D:1.

**Country Chart** A chart, found in Part 738 of the EAR, that contains certain licensing requirements based upon country of destination and specific control reasons. In combination

with the CCL, it delineates when a license is required for any item on the CCL to any country in the world.

**Country Groups.** For export control purposes, foreign countries are separated into five country groups designated by the letters A, B, C, D, and E (Supplement No. 1 to Part 740 of the EAR).

**Debarred List.** A U.S. Department of State list of parties who are barred by the ITAR (22 CFR 127.7) from direct or indirect participation in the export of defense articles including technical data or in the furnishing of defense services for which a license or approval is required by the ITAR. This is one of the multiple lists screened by the Visual Compliance software.

**Deemed Export.** The release of export-controlled items, commodities, goods, and technology that is “deemed” to occur when it is released to a foreign person in the U.S., including foreign visitors, emails, oral exchanges, and visual inspections and tours.

**Defense Article.** Any item designated in the ITAR/USML. 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 ITAR/USML.

**Defense Service.** The furnishing of assistance, including training, inside the U.S. or abroad, to foreign persons in connection with the design, development, engineering, manufacture, production, assembly, testing, repair, maintenance, modification, operation, demilitarization, destruction, processing, or use of defense articles. It also means the furnishing of any controlled technical data to foreign persons anywhere.

**Denied Persons List.** A list of specific individuals who have been denied export privileges, in whole or in part, by the Department of Commerce (Part 764, EAR). The full text of each order denying export privileges is published in the Federal Register. Any business activity or transaction with a party on this list would violate the terms of its denial order and is prohibited. This is one of the multiple lists screened by the Visual Compliance software.

**Dual Use.** Refers to items, commodities, goods, and technology that have both a commercial and military or proliferation application. Dual use items, commodities, goods, and technology are not inherently military in nature. They are primarily and inherently commercial, or potentially commercial, in nature but the government has decided they may have a dual use for a military purpose when received or obtained by particular individuals, or for particular purposes, or within particular countries. While this term is used informally to describe items that are subject to the EAR, purely commercial items are also subject to the EAR (Section 734.2 [a]).

**Embargoed Country.** A country upon which the U.S. government has imposed prohibitions of exports, imports, travel, and/or business activity or transactions. U.S. embargoes are tailored for stated purposes and vary widely in scope. They may be comprehensive and apply to all exports, imports, travel, and business activities and transactions (e.g., Cuba), they may target a specific activity (e.g., diamond trading, narcotics, terrorism, non-proliferation, illegal weapons, etc.), or they may penalize specific regions (e.g., the Balkans). Some embargoes ban transactions with governments, entities, and individual persons while other embargoes apply only to transactions with the government of embargoed countries.

**Empowered Official** A U.S. person who, according to 22 CFR 120.25:

- is directly employed by the applicant of an export license in a position that has authority for policy or management within the applicant organization; and,
- is legally empowered in writing by the applicant of an export license to sign export license applications or other requests for approval on behalf of the applicant; and,
- understands the provisions and requirements of the various export control statutes and regulations, and the criminal and civil liability and administrative penalties for violating the Arms Export Control Act and the ITAR; and,
- has the independent authority to:
  - inquire into any aspect of a processed export by the applicant: and,
  - verify the legality of the transaction and the accuracy of the information to be submitted: and,
  - refuse to sign any export license or other request for approval without prejudice or other adverse recourse.

**End Use** A detailed description of how the consignee or recipient of an export intends to use the items or commodities being exported. The burden is on the exporter to properly determine the end use of an export prior to shipment or transmission.

**End User** The foreign person that receives, and ultimately uses, the exported or re-exported items or commodities; the end user is not a forwarding agent or intermediary.

**Entity List** A list of parties whose presence in an activity or transaction can trigger a license requirement under the EAR. This list specifies the license requirements that apply to each listed party. Depending on the item being exported, a license to export to an organization on the Entity List may be required even if a license is not otherwise required. These license requirements are in addition to any other license requirements imposed on an activity or transaction by other provisions of the EAR. This is one of the multiple lists screened by the Visual Compliance software.

**Equipment Control Classification Number (ECCN)** A five-character alpha numeric code that identifies items on the Commerce Control List (CCL) that are subject to the export licensing jurisdiction of the Department of Commerce's Bureau of Industry and Security (BIS). Each ECCN contains reasons for control, cost thresholds, units (volume or mass), and related controls.

**Export** The term export is not defined identically in export control regulations, does not have the common dictionary definition, and has an expansive meaning. Generally, an export includes: 1) actual shipment out of the U.S., or between foreign countries, of any covered items, commodities, or goods; 2) the electronic or digital transmission out of the U.S., or between foreign countries, of any covered items, commodities, or goods or related items, commodities, or goods; or, any release or disclosure, including verbal disclosures or visual inspections, of any technology, software, or technical data to any foreign person, even if the release occurs in the U.S. An export may also include the actual use or application abroad of personal knowledge or technical experience acquired in the U.S. Discussions of any of the above material with a foreign person, regardless of the country of which the foreign person is a citizen, constitute an export to that foreign person's country. The U.S. Department of Commerce's viewpoint is that any item sent from the United States to a foreign destination is

an export. **Note:** how an item is sent outside of the U.S. does not matter in the determination of export license requirements.

**Export Administration Regulations (EAR)** The Bureau of Industry and Security (BIS) of the U.S. Department of Commerce is responsible for implementing and enforcing the Export Administration Regulations (EAR) as promulgated in 15 CFR 730-774. The EAR regulates the export and re-export of most commercial items. These items that BIS regulates are often referred to as "dual-use" items, i.e., items that have both commercial and military or proliferation applications but purely commercial items without an obvious military use are also subject to the EAR. The EAR do not control all goods, services, and technologies. Other U.S. government agencies regulate more specialized exports, e.g., the U.S. Department of State has authority over defense articles and services.

**Export Control Officer (ECO)** Typically, an ECO is the person responsible for: the implementation of export control policies and procedures throughout the organization; providing advice to the organization in all export-related matters; representing the organization in all interactions with federal agencies with export control authority; ensuring organizational compliance with federal export laws and regulations by implementing and administering an effective Export Management and Compliance Program (EMCP); serving as the organization's liaison with the U.S. Departments of Commerce, State, and Treasury and any other federal agency concerning export control matters and travel embargoed and sanctioned countries; and, preparing, coordinating, and submitting license applications and organizational registrations when necessary. An ECO may also serve as the Empowered Official for the organization.

**Export Hold** If a business activity or transaction is placed in an "Export Hold" status, all TEEEX personnel shall take no further action with respect to such activity or transaction until an investigation is completed by the Export Control Officer.

**Export License** The approval documentation issued by a federal export agency authorizing the recipient to proceed with the export, re-export, or other regulated activity as specified on the application.

**Foreign Entity** A business or other entity not incorporated in the U.S. to include foreign governments.

**Foreign Person** For export control purposes, a foreign person includes an individual in the U.S. in non-immigration status, i.e., H-1B, H-3, L-1, J-1, B-1, practical training, and individuals unlawfully in the U.S. A foreign person is also any branch of a foreign government and any foreign corporation or group that is not incorporated or organized to conduct business in the U.S. For export control purposes, a foreign person is not 1) an individual who is a U.S. citizen; 2) a lawful permanent resident of the U.S. who has been accorded the privilege of residing permanently in the U.S. as an immigrant in accordance with the immigration laws; and 3) a refugee; 4) a protected political asylee; 5) or an individual granted temporary residency under amnesty or Special Agricultural Workers provisions.

**Good** Any article, natural or man-made substance, material, supply, or manufactured product, including inspection and test equipment and excluding technology.

**International Traffic in Arms Regulations (ITAR)** The Directorate of Defense Trade Controls (DDTC) of the U.S. Department of State is responsible for implementing and enforcing the ITAR

as promulgated in 22 CFR 120-130. The ITAR regulate the export and temporary import of defense articles and defense services covered by the United States Munitions List (USML).

**Office of Foreign Assets Control (OFAC)** The OFAC is an office in the US Department of the Treasury which 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. The OFAC acts under Presidential national emergency powers, as well as authority granted by specific legislation, to impose controls on transactions and freeze assets under U.S. jurisdiction. Many of the sanctions are based on United Nations and other international mandates, are multilateral in scope, and involve close cooperation with allied governments.

**Re-export** The shipment or transmission of items, commodities, goods, technology, or information to a different end user, and/or for a different end use, and/or to a destination other than the country of original export. For the purposes of the EAR, the export or re-export of items subject to the EAR that will transit through a country or countries to a new country, or are intended for re-export to the new country, are deemed to be exports to the new country. A re-export also occurs when there is release of technology or software (source code) subject to the EAR in one foreign country to a person of another foreign country.

**Restricted Party Screening (RPS)** A main component of export control compliance in which the agency mitigates the risk of unknowingly releasing controlled goods or technology or conducts business activities or transactions with a person or entity prohibited by the U.S. government or an embargoed or sanctioned country. The RPS conducted by the Visual Compliance software searches approximately fifty lists from multiple federal agencies; a.k.a. Denied Party Screening.

**Sanctioned Country** A country designated by the OFAC or the U.S. Department of State as having comprehensive, limited, or regime-based trade or economic sanctions imposed by the U.S. for reasons of anti-terrorism, non-proliferation, narcotics trafficking, or other national security, foreign policy, or economic reasons.

**Specially Designated National (SDN)** Any person who is determined by the U.S. Secretary of the Treasury to be a specially designated national for any reason under regulations issued by the OFAC (31 CFR 500-590). SDNs are individuals and entities, located in the U.S. and worldwide, who are connected directly or indirectly with the government of an embargoed or sanctioned country. The SDN List identifies individuals and entities with whom U.S. citizens and permanent residents, regardless of their location, are prohibited from conducting business activities or transactions. This is one of the multiple lists screened by the Visual Compliance software.

**Technical Assistance** Technical assistance may take forms such as instruction, skills training, working knowledge, consulting services, and may also involve the transfer of technical data.

**Technical Data** Information of any kind that can be used, or adapted for use, in the design, development, production, manufacture, assembly, operation, repair, testing, maintenance, or modification of controlled articles or materials. This includes information in the form of blueprints, drawings, plans, instructions, diagrams, prototypes, models, formulae, tables, photographs, etc. It may take tangible forms such as blueprints, plans, diagrams, models,

formulas, tables, engineering designs and specifications, operating manuals and instructions written or recorded on other media or devices such as disk, tape, or read only memories. The ITAR definition does not include information concerning general scientific, mathematical, or engineering principles commonly taught in schools, colleges, and universities, or information published in the public domain.

**Technology** Any specific information and know-how, either in tangible forms (i.e., models, prototypes, drawings, sketches, diagrams, blueprints, manuals, or software), or in intangible form (i.e., training, instruction, or consulting or technical services) that is required for the development, production, operation, or use of a good; but not the good itself.

**Unverified List** A list of parties that the Bureau of Industry and Security (BIS) has not been able to verify the end user in prior transactions. The presence of a party on this list is a “red flag” that should be resolved prior to proceeding with a transaction. This is one of the multiple lists screened by the Visual Compliance software.

**U.S. Munitions List (USML)** The ITAR contain a list of all articles, services, and related technical data that is controlled by the U.S. Department of State. Items on the USML are divided into 21 categories. If an item is on the USML, it is considered a defense item and requires an individual validated license for export. The USML is found in 22 CFR 121.

## Requirements (Required)

### 1. Agency Export Compliance Commitment Statement

- 1.1. Texas A&M Engineering Extension Service (TEEX) will comply fully with all applicable federal laws and regulations concerning export controls and embargoed and sanctioned countries, entities, and individuals. In particular, TEEX business units, and all entities in which TEEX business units conduct activities and transactions, shall comply with all applicable federal laws, regulations, and executive orders concerning export controls and embargoed and sanctioned countries, entities, and individuals and shall only conduct business with countries, entities, and individuals that are fully committed to complying with and assisting TEEX in complying with such laws and regulations
- 1.2. TEEX business activities or transactions will not be initiated or conducted, nor any goods or services exported or deemed exported, with individuals or entities that are on any of the U.S. government lists screened with the Visual Compliance software application until adequate risk-assessments are conducted by the respective Division Director and the agency Export Control Officer (ECO).
- 1.3. It is the responsibility of TEEX employees who conduct business activities and transactions with foreign countries, entities, and persons to be aware of and comply with all applicable federal laws, regulations, and executive orders and the Texas A&M University System (TAMUS) Policy 15.02 (Export Controls). Under no circumstances shall TEEX employees engage in activities or transactions in violation of U.S. export control laws.

### 2. Background

- 2.1. Federal laws restricting exports to certain foreign countries, persons, companies, and organizations have existed since the 1940s. However, since the terrorist attacks on the U.S. in September 2001, these laws and regulations have been strengthened and are enforced much more vigorously. Under U.S. laws, exporting is considered a privilege and not a right.
- 2.2. Federal export control laws and regulations restrict the shipping, transmission, or transfer of certain categories of items, commodities, goods, information, and technology from the U.S. to foreign countries or to foreign persons located in the U.S. Additionally, export control laws restrict the shipping, transmission, or transfer of certain categories of items, commodities, goods, information, and technology to certain prohibited countries, entities, and persons. Export control laws and regulations also apply to agency property and equipment taken outside of the U.S. and returned to the U.S. during international travel activities (e.g., laptop computers, GPS, tablets, cell phones, media storage devices, etc. and the software installed on such electronic equipment).
- 2.3. Developing and implementing an effective export compliance program can be complicated and presents significant challenges. Often there is an overemphasis on "landing the deal" without adequately assessing the associated risks presented by an illegal or inappropriate export. The long-term viability and reputation of TEEX can be threatened if it is found to be responsible for conducting illegal exports. Effective export compliance programs create a sustainable system of effective controls and procedures without unduly hampering legitimate business activities and transactions.

### **3. Applicable Export Control Laws and Regulations**

- 3.1. Three principal U.S. regulatory and controlling authorities govern and control the export and deemed export of items, commodities, goods, information, and technology. These regulatory authorities are derived from enabling federal laws (United States Code [USC]), i.e., the Arms Export Control Act (AECA), Export Administration Act (EAA), International Emergency Economic Powers Act (IEEPA), and Trading with the Enemy Act (TWEA).
- 3.2. **The U.S. Department of State** (Directorate of Defense Trade Controls [DDTC]) administers the International Traffic in Arms Regulations (ITAR), 22 CFR 120-130 (Foreign Relations), which governs the export of defense articles and related technical data i.e., items, information, or technology that are "inherently military" in nature as well as most space-related items. Such items are found in one of the twenty one categories of the U.S. Munitions List (USML) in the ITAR. The ITAR and USML are updated and re-published annually in the CFR. An ITAR link is available online at the myTEEX portal (International tab/Export Controls link).
- 3.3. **The U.S. Department of Commerce** (Bureau of Industry and Security [BIS]) administers the Export Administration Regulations (EAR), 15 CFR 730-774 (Commerce and Foreign Trade), which governs the export and re-export of commercial items, goods, software, technologies, and information that are "dual-use" in nature, i.e., items that have both commercial and military or proliferation applications. Such items are found on the Commerce Control List (CCL; 15 CFR 774). However, purely commercial items without an obvious military use are also subject to the BIS regulations because the BIS has export

jurisdiction over all goods in the U.S. The EAR and CCL are updated and re-published annually in the CFR. An EAR link is available online at the myTEEX portal (International tab/Export Controls link).

- 3.4. **The U.S. Department of Treasury** administers the U.S. economic embargoes and sanctions programs through its Office of Foreign Assets Control (OFAC). The OFAC imposes, administers, and enforces economic and trade sanctions based on U.S. foreign policy, national security, and economic goals against targeted foreign countries, terrorists, international narcotics traffickers, and those engaged in activities related to the proliferation of weapons of mass destruction. For certain prohibited persons, entities, or destinations, the export of all items, information, or technologies is generally prohibited under the OFAC regulations (31 CFR 500-599). The OFAC has broad authority to prohibit, interdict, and block trade or financial transactions and other business activities and transactions in which U.S. persons may not engage unless authorized by the OFAC or expressly exempted by statute. These activities and transactions include payments or providing anything of value to sanctioned countries, foreign persons of some countries, and specified entities as well as travel to and other activities with embargoed countries even when exclusions to the ITAR and EAR may apply. All U.S. citizens and permanent resident aliens must comply with the OFAC regulations, regardless of where they are located. U.S. persons are also prohibited from assisting foreign corporations with activities and transactions in which the U.S. persons themselves could not legally participate.
- 3.5. Generally, the OFAC regulatory controls take precedence over the ITAR and EAR export control regulations, i.e., the OFAC prohibitions apply even if an item, commodity, good, technology, or information does not require licensing under the ITAR or EAR regulatory controls or is eligible for an exclusion or exception. The OFAC licenses do not authorize exports under the ITAR or EAR nor do the ITAR or EAR licenses authorize the OFAC sanctioned activities; exporters are required to comply with each regulatory control separately.

#### **4. Exports and License Requirements and Exclusions**

- 4.1. The term export is not defined identically in the numerous federal export control regulations, does not have the common dictionary definition, and has an expansive meaning. Generally, an export includes:
  - 4.1.1. actual shipment out of the U.S., or between foreign countries, of any covered items, commodities, or goods;
  - 4.1.2. the electronic or digital transmission out of the U.S., or between foreign countries, of any covered items, commodities, or goods or related items, commodities, or goods; or,
  - 4.1.3. any release or disclosure, including verbal disclosures or visual inspections, of any technology, software, or technical data to any foreign person, even if the release occurs in the U.S.
- 4.2. An export may also include the actual use or application abroad of personal knowledge or technical experience acquired in the U.S.



- 4.3. Discussions of any of the above material with a foreign person, regardless of the country of which the foreign person is a citizen, constitute an export to that foreign person's country.
- 4.4. Comprehensive definitions are contained in the applicable federal export control regulation.
- 4.5. A deemed export is the release of export-controlled items, commodities, goods, and technology that is "deemed" to occur when it is released to a foreign person in the U.S., including foreign visitors, emails, oral exchanges, and visual inspections and tours. A re-export occurs when a foreign person or business takes an export from the U.S. and further exports it to another foreign country.
- 4.6. The vast majority of exports do not require government licenses. However, all U.S. exports are controlled in some manner. Exports from the U.S. must be made under a:
  - 4.6.1. validated export license issued by the controlling federal agency;
  - 4.6.2. specific license exclusion, exception, or exemption; or,
  - 4.6.3. general license, i.e., an export is not controlled under any of the applicable federal regulations and it is not bound for a prohibited or restricted destination. General licenses are commonly referred to as EAR99 and/or NLR (No License Required). EAR99 technically means that the item, commodity, good, or technology is "subject to the EAR" but no prior approval is required because the item, commodity, good, or technology falls below an applicable CCL/ECCN threshold (e.g., value, volume, units, or country coverage).
- 4.7. The need for a validated export license from the U.S. government is determined primarily by the:
  - 4.7.1. nature and type of item being exported;
  - 4.7.2. U.S. government's concern about the country of final destination; and,
  - 4.7.3. U.S. government's concern about the end user and end use of the item, commodity, good, technology, or service.
- 4.8. If an item of equipment, technology, or technical data is controlled under the jurisdiction of the ITAR/USML, a license is always required before it is allowed to be shipped to any country outside of the U.S., except in limited instances such as shipment to a U.S. military installation overseas.
- 4.9. If an item, commodity, good, or technology is controlled under the jurisdiction of the EAR, licensing requirements depend upon the country to which the item, commodity, good, technology, or service is to be shipped. No license or other authorization is required for any export transaction subject to the EAR unless the EAR affirmatively states such a requirement.
- 4.10. ITAR/USML NLR and EAR99/NLR determinations, exclusions, and exceptions require no application or prior authorization and no written general license is issued.

- 4.11. Export, deemed export, and trade sanctioned activities and transactions are prohibited if an export license (ITAR/EAR) and/or trade sanction authorization (OFAC) is required and not obtained by the exporter.
- 4.12. An individual validated export license requires written approval from the issuing federal agency prior to exporting and a formal written license is issued. An individual validated export license is valid only for that specific, single transaction, i.e., only for a specific quantity or value of product to be shipped from a certain manufacturer to a specific consignee within a specific time frame. Most applications for a validated export license also require support documentation, which usually includes an end use statement by the ultimate consignee. In addition to stating the end use of the controlled product, an end use statement also declares that the product will not be re-exported or incorporated into an end product that would be transferred to an unauthorized country.
- 4.13. Typically, it can take a minimum of sixty to ninety (60-90) days to obtain an export license and the average processing time for export license applications is six months.
- 4.14. The large majority of TEEX curriculum, training, instruction, technical assistance activities and associated items of equipment, commodities, goods, and technology will most likely not require export licenses under the ITAR (NLR) and will probably be exported under the EAR as an EAR99 designated item.
- 4.15. If any TEEX curriculum, training, instruction, technical assistance activities and associated equipment, commodities, goods, technology, or services is export-controlled under the ITAR/USML or EAR/CCL, it must be determined if one of the federal regulatory license exclusions or exceptions may apply.
- 4.16. In order to provide evidence of the agency's due diligence and risk mitigation efforts, when an agency activity or transaction involves an export, or a deemed export, TEEX employees shall adhere to the provisions of this SAP and document their analysis and assessment of export control compliance, including the determination that an export does not require a license (NLR) under the ITAR, or it is categorized as EAR99 NLR under the EAR, or that a regulatory exclusion or exception applies.
- 4.17. Public Domain (ITAR terminology) and Publicly Available (EAR terminology) Exclusions may apply to information (not physical items or services) that is already published through specified means and found in:
  - 4.17.1. libraries open to the public;
  - 4.17.2. unrestricted subscriptions, newsstands, or bookstores for a cost not exceeding reproduction and distribution costs (including a reasonable profit);
  - 4.17.3. published patent information;
  - 4.17.4. conferences, meetings, seminars, trade shows, or exhibits held in the U.S. (ITAR) or anywhere (EAR), which are generally accessible to the public for a fee reasonably related to the cost and where the attendees may take notes and leave with their notes (Note: closed conferences do not qualify under either the ITAR or EAR); or,

- 4.17.5. websites that are accessible to the public for free and without the host's knowledge of, or control of, who visits or downloads software or information (clearly acceptable under EAR and likely acceptable under ITAR).
- 4.17.6. Preconditions for the publicly available exclusion to apply are: no equipment or encrypted software involved; no reason to believe information will be used for WMD purposes; and, the federal government has not imposed any access and dissemination controls as a condition of funding (applicable to grant-related projects).
- 4.18. Educational Information Exclusions may apply to:
  - 4.18.1. ITAR (primarily focused on the subject matter): general science, math, and engineering commonly taught at schools and universities; and,
  - 4.18.2. EAR (primarily focused on the venue; doesn't cover encrypted software): information conveyed in courses listed in course catalogs and in their associated teaching labs of any academic institution.

## 5. Roles and Responsibilities

Although the agency provides export control advice and assistance to its business units, the primary responsibility for export control compliance rests with the individuals involved in the international business activity or transaction, in particular, program managers and other individuals in similar supervisory positions.

- 5.1. **Empowered Official.** The Director of Strategic and Education Services who has the authority to verify the legality of business transactions, apply for export licenses if required, and stop export transactions (see 22 CFR definition this SAP). Only the Empowered Official has the executive authority to bind TEEX in any proceedings before government agencies with export control authority.
- 5.2. **Export Control Officer (ECO).** The Director of Strategic and Education Services responsible for:
  - 5.2.1. the implementation, oversight, and monitoring of the agency's EMCP;
  - 5.2.2. the establishment and maintenance of a centralized record storage system;
  - 5.2.3. export control awareness training;
  - 5.2.4. assisting business units with export, and deemed export, risk assessments and determinations;
  - 5.2.5. the Visual Compliance software application screening process;
  - 5.2.6. serving as the agency primary point of contact for export control matters;
  - 5.2.7. consulting with the TAMUS Office of General Counsel (OGC) on export control matters;
  - 5.2.8. appointing Alternate ECOs to fulfill the ECO responsibilities in the absence of the ECO; and,

- 5.2.9. receiving and properly acting upon notification of the occurrence of any event delineated in Procedure 15 of this SAP.

**5.3. IT Security & Chief Technology Officer.** Responsible for:

- 5.3.1. tracking and screening of all software applications in which TEEX has a license and determining if there are any license provider proprietary prohibitions against exporting the software application out of the U.S; and
- 5.3.2. acquiring Equipment Control Classification Numbers (ECCN) from vendors, either at the time of purchase or subsequent to a purchase, and storing the ECCNs for all equipment and software purchases made by the Network and Information Service (NIS) department.

**5.4. Division Director (DD).** Responsible for:

- 5.4.1. designating an individual who will be responsible for assisting program managers and other individuals with the identification and resolution of export issues and managing export compliance within the division;
- 5.4.2. in consultation with the ECO, determining the legality or appropriateness of all exports, and deemed exports, to foreign countries, entities, and persons when the Visual Compliance screening process identifies potential export, or deemed export, issues; and,
- 5.4.3. ensuring that the TEEX employees within their respective divisions comply with the provisions of this SAP.

**5.5. Division Program Managers (PM) (or managers in positions of equivalent levels of responsibility).** Responsible for:

- 5.5.1. Primary programmatic and budgetary management export compliance responsibility for the TEEX business activity or transaction that will be exported or deemed exported.
- 5.5.2. Ensuring the steps necessary are taken to ascertain the ultimate destination, end use(s), and end user(s) of TEEX products and services
- 5.5.3. Drafting the proposal or letter of agreement to include the customer, the points of contact, the parameters of the service provided or received, the start and end dates, the location, the benefit to the Agency and the amount of the contract for review by Contract Services.

**5.6. Contract Officer.** Responsible for:

- 5.6.1. Reviewing the proposal or letter of agreement along with the completed TEEX eForm SES 23 Visual Compliance results.
- 5.6.2. Based on the SES Visual Compliance screening results, Contract Services will work with the ECO or Alternate ECO for assistance with any questions.

**5.7. Purchasing Agent:** Responsible for:

- 5.7.1. Division purchases above \$10,000 dollars must include a purchase order to Financial Services that will be submitted to TAMU (as the buyer). Purchases of

less than \$10,000 will be done at the Division level by personnel with purchasing authority.

- 5.7.2. Export Control Classification numbers attached to items or products purchased must be included on the purchase documents for compliance & inventory purposes.
- 5.7.3. It is important to identify the procurement of ITAR items at an early stage because the State Department tightly restricts foreign national access to ITAR items regardless of whether or not there is an intention to use the item or an understanding of how to use it. This includes visual access in the training environment. EAR restrictions, on the other hand, are “use-based” restrictions: access to (and operation of) the item is generally not an issue, absent certain exceptional use related conditions.
- 5.7.4. Prior to purchase, if an ITAR items is identified, the ECO should be contacted so appropriate measures can be taken.

## **6. Visual Compliance Software Application**

- 6.1. TEEX, as participant in a TAMUS shared service, uses the Visual Compliance web-based software application from eCustoms (an MSR Company). As a comprehensive export control screening system, this software application allows the agency to screen the U.S. Munitions List (USML) and the Commerce Control List (CCL) for all export controlled items of equipment, commodities, goods, technology, and technical data by Export Control Classification Number (ECCN) and all relevant U.S. government lists of persons, entities, and countries for export jurisdiction prohibitions and issues under the ITAR, EAR, and OFAC (Restricted Party Screening).
- 6.2. This software application maintains electronic records of all screening actions and results for a period of five (5) years. This software is updated frequently to reflect changes to the federal controlling authorities and the Restricted Party Screening lists.
- 6.3. The TEEX ECO and Alternate ECOs are the only authorized licensed users of this software application.

## **7. Screenings, Export Compliance, Reviews and Assurances**

- 7.1. It is important to identify and manage export control matters as soon as possible.
- 7.2. **Restricted Party Screenings.** To ensure that TEEX does not conduct business with persons or entities that have been debarred, denied export privileges, identified as a risk, or are otherwise identified in one of the numerous U.S. government lists, TEEX must screen persons, entities, and countries involved in the export, or deemed export, of a business activity or transaction:
  - 7.2.1. in the consideration of business activities and proposals involving international deliverables;
  - 7.2.2. prior to submitting proposals or signing contracts for any business activities and transactions involving international deliverables or deliverables in the U.S. if foreign persons or entities are involved in the activity or transaction;

7.2.3. in the planning of international travel; and,

7.2.4. in the invitation and hosting of foreign visitors to TEEEX.

**7.3. Major Export Compliance Steps.** The following are the major steps to accomplish in order to comply with export laws and regulations. The Visual Compliance software application is able to assist in the accomplishment of most of these steps.

7.3.1. Determine the nature of the export and the jurisdiction of the export, i.e., ITAR/USML or EAR/CCL.

7.3.2. Classify the item (ECCN) to be exported or purchased (self-classify or obtain ECCN from manufacturer).

7.3.3. Cross-reference against the EAR Country Chart (Reason for Control).

7.3.4. Determine if license is required; if so, determine if any export exclusions or exceptions apply.

7.3.5. Screen all parties to the proposed export or deemed export (i.e., foreign persons, entities, and countries that are prospective customers, vendors, suppliers, subcontractors, sales representatives, consultants or any party to a proposed export, or deemed export, activity and transaction).

7.3.6. Ensure there are no prohibited uses of the export.

7.3.7. Record and retain records that demonstrate the accomplishment of the above steps

7.3.8. Export to authorized destinations under appropriate authorizations.

**7.4. TEEEX Export Reviews and Assurances.** TEEEX international activities and transactions that require export review and screening of the ITAR/USML, EAR/CCL, and Visual Compliance Restricted Party Screening (foreign persons, entities, and countries), and assurance statements include, at a minimum:

7.4.1. the export, or deemed export, of curriculum/training courses, or technical assistance (TA) services and accompanying items;

7.4.2. the conduct of international business activities and transactions with foreign persons, entities, and countries;

7.4.3. international travel by TEEEX employees and items accompanying international travelers; and/or,

7.4.4. TEEEX invitations and hosting of foreign visitors.

## **8. TEEEX eform SES 23 (Export Reviews and Assurances)**

When TEEEX employees plan to travel internationally or TEEEX curriculum/training courses or technical assistance (TA) services will be delivered outside of the U.S. or in the U.S. to foreign entities or persons, the PM (or a manager in a position of equivalent level of responsibility) responsible for the curriculum or TA service to be exported, or deemed exported, shall accomplish the following actions related to the form.

The form should be submitted no less than three (3) business days prior to the trip, scheduled visit or business discussions. Submitting the form earlier allows for any issues to be resolved expeditiously. TEEX eForm SES23SES (Export Reviews and Assurances) is available online at the myTEEX portal (access via Forms tab or International tab/Export Controls link).

- 8.1. **Complete Section I (Purpose of This SES Submission) of the** TEEX eForm SES 23 (Export Reviews and Assurances). The purpose is designated as either travel or non-travel related. Based on the designated purpose, all applicable section(s) must be completed and signed as required by the form. At a minimum, Section II must always be completed.
- 8.2. **Complete and electronically sign Section II.** (Request for Restricted Party Screening). In order to enhance screening accuracy, provide complete and full names of persons and complete names and addresses for entities being screened.
  - 8.2.1. **International Travel Requests.** All TEEX employees who will be traveling outside of the U.S. shall complete Section II. (Request for Restricted Party Screening) of the TEEX eForm SES 23 (Export Reviews and Assurances) to request the Visual Compliance Restricted Party Screening of foreign persons, entities, and countries, with whom they will be conducting business activities or transactions during the international travel and submit the form electronically to the ECO. The purpose of this screening is to attain a reasonable level of assurance that the foreign persons, entities, and/or countries are not export-prohibited by the EAR or prohibited by OFAC from conducting business activities and transactions.
  - 8.2.2. The ECO or Alternate ECO shall conduct the Visual Compliance screening and electronically sign the submitted SES 23 once restricted party screenings are satisfactorily made. The ECO's office will retain the TEEX eForm SES 23 and the Visual Compliance screening results for the required record retention period. A copy of the Visual Compliance screening results will be sent electronically to the requesting PM. **The traveler must submit the ECO- or Alternate ECO-signed Visual Compliance Results through the agency's travel management system (Concur) when requesting approval to travel internationally.**
  - 8.2.3. **Non-Travel Related Requests.** To request Visual Compliance Restricted Party Screening of foreign persons, entities, and countries that will be parties to a TEEX visit, proposal or contract for delivering or distributing course content and materials or TA services complete TEEX eForm SES 23 and submit the form electronically to the ECO and Alternate ECO. The purpose of this screening is to attain a reasonable level of assurance that the foreign persons, entities, and/or countries are not export-prohibited by the EAR or prohibited from conducting business by OFAC. The ECO or Alternate ECO shall conduct the Visual Compliance screening and retain the TEEX eForm SES 23 and the Visual Compliance screening results for the required record retention period. An electronically signed copy of the Visual Compliance screening results will be electronically sent to the requesting PM. This copy of the Visual Compliance

screening results will be submitted with the contract to the TEEX Office of Contract Services as proof of the required screening.

- 8.2.4. If a TEEX business unit provides another TEEX business unit with a prospective international business opportunity, it is the responsibility of the business unit that receives the business opportunity to comply with the Restricted Party Screening requirements and other provisions of this SAP.
- 8.3. **If any of the Visual Compliance Restricted Party Screening results in a match(es) of persons, entities, or embargoed or sanctioned countries, the business activity or transaction shall be placed in an “export hold” status by the ECO. The DD responsible for the respective business activity or transaction, in consultation with the ECO, shall assess the risk involved with the match(es) and determine whether the activity or transaction may proceed and, if the activity or transaction can proceed, ensure that all necessary authorizations are obtained.**
- 8.4. If a TEEX business unit provides another TEEX business unit with a prospective international business opportunity, it is the responsibility of the business unit that receives the business opportunity to comply with the Restricted Party Screening requirements and other provisions of this SAP.
- 8.5. TEEX business units are not required to individually screen each TEEX foreign student or participant in TEEX courses or TA services delivered in the U.S. or in a foreign country. However, when foreign students or participants will receive TEEX training or TA services as a result of a proposal and/or contract, the responsible PM (or a manager in a position of equivalent level of responsibility) shall ensure that the foreign persons, entities, and countries involved in the proposal and/or contract are screened according to the provisions of 8.2.4 above.
- 8.6. When entering into any business collaborations or negotiations with U.S. persons and entities that will result in a TEEX contract, the responsible PM (or a manager in a position of equivalent level of responsibility) shall ascertain that the end use(s) and end user(s) of any TEEX products or services are not foreign. If the end use(s) or end user(s) of such a contract are foreign persons or entities, the PM shall acquire the end use country(ies) and primary end user(s) information in order to request Restricted Party Screening in accordance with the provisions of 8.2.4 above.
- 8.7. **Section III. Certification of Items Accompanying TEEX International Travelers.** Complete and electronically sign if directed by Section I of the form.
  - 8.7.1. Depending on the destination of the international travel and the items accompanying international travelers, an export license or other government authorization may be required for laptop computers, software, and other electronic and digital devices. There are temporary export (TMP) license exceptions to the EAR for “tools of trade,” but these exceptions depend on the equipment, software, and country of destination. Encryption software is always subject to regulation and control and usually requires more stringent license requirements.



- 8.7.2. TEEEX employees traveling outside of the U.S. with TEEEX-issued items of equipment considered to be “tools of trade” (e.g., laptop computers, tablets, media storage devices, cameras, GPS, etc.), whether they are hand-carried or shipped, shall ensure that there is no export-controlled information contained or stored in such items or devices unless they have a specific license or authorization for such information for the specific country they intend to visit.
- 8.7.3. TEEEX employees traveling outside the U.S. with TEEEX-issued items of equipment (e.g., laptop computers, tablets,, media storage devices, cameras, GPS, etc.), whether they are hand-carried or shipped, shall complete and electronically sign Section III (Certification of Items Accompanying International Travelers) of the TEEEX eForm SES 23 (Export Reviews and Assurances) and submit the form electronically to the ECO. The purpose of this section of the form is to obtain a certification that a TEEEX employee is not transporting any export-controlled information in any TEEEX-issued items unless there is a license or other authorization in effect for that information for that travel destination and to ensure that the traveler understands the conditions of the “tools of trade” temporary exception (TMP) to the EAR. The ECO or Alternate ECO shall review the form for completeness and electronically sign the form. The signed form will be sent to the traveler and the TEEEX eForm SES 23 will be retained for the required record retention period.
- 8.7.4. Refer to the TEEEX Software License Screening for Export Controls Table, available online at the myTEEX.com portal (International tab/Export Controls), for export information concerning proprietary software applications sponsored and installed by TEEEX NIS.
- 8.8. Section IV. Export of Curriculum and Technical Assistance (TA) Services.** Complete if directed by Section I of the form. Review the course and TA content and associated materials that will be exported, or deemed exported, to confirm that it is not controlled under the jurisdiction of the ITAR or EAR.
- 8.8.1. If any of the course or TA content is controlled by the ITAR or EAR, the PM shall determine if the export-controlled content is eligible for a public domain, publically available, or educational information exclusion.
- 8.8.2. Once the determinations in 7.8.1 above are satisfactorily made, the PM shall complete and electronically sign Section IV. (Export of Curriculum and Technical Assistance [TA] Services) of the TEEEX eForm SES 23 (Export Reviews and Assurances) and submit the form electronically to the ECO. The ECO or Alternate ECO shall review the form for completeness and electronically sign the form. The signed form will be sent to the traveler and the TEEEX eForm SES 23 will be retained for the required record retention period.
- 8.9. Section V. Request for Screening Equipment, Commodities, Goods, and Technology for Export or Deemed Export.** Complete and electronically sign if directed by Section I of the form. Review the course and TA content and associated materials that will be exported, or deemed exported, to confirm that it is not controlled under the jurisdiction of the ITAR or EAR.

- 8.10. **Section VI. Request for Purchasing from a Foreign Entity.** Divisions draft a letter of agreement to include all the pertinent information needed in the contract. A Letter of Authorization (LOA) will need to be signed by the Division Director or the Associate Division Director. Federal and foreign contracts are signed by the CFO. Should the primary signer be unavailable, delegation of authority can be found on TEEEX Form CS-22.

## 9. Export Control Red Flags

The following abnormal or suspicious circumstances are red flag indicators of a possible unlawful export or diversion. If any of these red flag indicators appear, TEEEX employees should obtain as much information as possible without alerting the client, customer, or end user to the suspected indicator. TEEEX employees shall immediately report the occurrence of any of these red flag indicators to the ECO first, and then to their direct report supervisor (unless the direct report supervisor may be an accessory to the red flag indicator). Until the red flag indicator is cleared by the ECO, the activity and/or transaction shall be placed in an “export hold” status by the ECO.

- 9.1. The end user information provided is incompatible with the customary purpose for which the goods or service is designed.
- 9.2. The customer is reluctant to provide information on the end use or end user of the goods or service.
- 9.3. The customer is willing to pay well in excess of the market value of the goods or services.
- 9.4. The final consignee is a trading company, freight forwarder, export company, or other entity with no apparent connection to the customer.
- 9.5. The customer appears unfamiliar with the goods and service being provided.
- 9.6. The customer desires to purchase goods and services that do not correspond with their stated line of business.
- 9.7. The customer is acting as the purchaser of goods and services for other parties. Note: this is an indicator that a “re-export” is occurring.
- 9.8. The international deliverable order is placed by entities or individuals from foreign countries other than the country of the stated end user. Note: this is an indicator that a “re-export” is occurring.
- 9.9. The goods and/or services are being processed or shipped via circuitous or economically illogical routing, i.e., through Canada to a non-Canadian end user. Note: this is an indicator that a “re-export” is occurring.
- 9.10. The customer claims to be from a particular public or private entity but business emails from him/her are sent from a personal Yahoo, Hotmail, etc. account.
- 9.11. The customer requests any accounts payable funds be transferred to or deposited a financial institute in an embargoed or sanctioned country.

## 10. Anti-boycott Compliance

- 10.1. U.S. statutes and Department of Commerce and Treasury regulations exist that require U.S. persons and business entities to refuse to participate in foreign boycotts that are not sanctioned by the U.S. These anti-boycott laws are designed to counter any foreign government's economic boycotts of countries friendly to the U.S. In the context of the Export Administration Act (EAA), the term "boycott" is primarily used to refer to economic coercion associated with tactics such as refusing to engage in business transactions or conditioning business transactions on agreements that a party will not do any business with another party or country.
- 10.2. The anti-boycott provisions of the EAR apply to the activities of U.S. persons in the interstate or foreign commerce of the U.S. The term "U.S. person" includes all individuals, corporations, and unincorporated associations residing in the U.S., including the permanent domestic affiliates of foreign concerns. U.S. persons also include U.S. citizens abroad (except when they reside abroad and are employed by non-U.S. persons) and the controlled in fact affiliates of domestic concerns. The test for "controlled in fact" is the ability to establish the general policies or to control the daily operations of a foreign affiliate. The scope of the EAR is limited to actions taken with intent to comply with, further, or support an unsanctioned foreign boycott.
- 10.3. TEEX employees shall not participate in any business activity or transaction in which parties to the activity or transaction request TEEX participation in an unsanctioned boycott or attempt to impose prohibited boycott conditions in:
  - 10.3.1. a questionnaire or survey;
  - 10.3.2. a proposal response and/or invitation to bid;
  - 10.3.3. a purchase order or any other type of contract;
  - 10.3.4. an agreement to furnish information about race, religion, sex, or national origin of another person;
  - 10.3.5. an agreement to discriminate against persons based upon race, religion, sex, national origin, or nationality; or,
  - 10.3.6. an agreement to refuse to do business with or in Israel, or to furnish information about business relationships with or in Israel, or with blacklisted companies.
- 10.4. The EAR requires U.S. persons to report requests they receive that would require them to take certain actions to comply with, further, or support an unsanctioned foreign boycott. If a TEEX employee suspects that a person with whom they are conducting business activities and transactions has directly or indirectly solicited any prohibited boycott provisions or conditions, the employee shall immediately report such activity to the ECO. Do not alert the suspected person to the suspected anti-boycott provision violation. The ECO, in consultation with the TAMUS OGC, will determine if the suspected anti-boycott solicitation warrants reporting to the Department of Commerce.

## **11. Export Control Training**

The following personnel are required to complete the “TEEX Export Management and Compliance Program (EMCP): A Program Overview” training course, available online at the TAMUS Train Traq campus (Single Sign-On [SSO] menu at <https://sso.tamus.edu>), once every year. Assignments of training are done by the ECO or Alternate ECO.

- 11.1. PMs (or managers in positions of equivalent levels of responsibility) who are involved in any business activity or transaction involving foreign persons, entities, and/or countries. Note: any TEEX employee that intends to submit a signed TEEX eForm SES 23 must complete this training prior to signing any section of the form.
- 11.2. Any TEEX employee who must travel internationally on TEEX business.
- 11.3. Any TEEX employee responsible for reviewing and/or signing an international contract,
- 11.4. Any TEEX employee involved in the procurement process of an ITAR controlled item or the purchase of an item from a foreign vendor,
- 11.5. Other TEEX employees at the direction of their supervisor.

## **12. Recordkeeping Requirements**

- 12.1. All export control decisions and Visual Compliance screening results will be documented and copies retained by the ECO.
- 12.2. In general, U.S. export regulations require that export records be maintained and retained for a minimum of five (5) years from the date of the last activity or transaction or the expiration date of an export license or authorization, whichever is later.
- 12.3. Export control records shall be maintained and retained for the longer of:
  - 12.3.1. the record retention period required by the applicable export control regulation (i.e., the ITAR, EAR, or OFAC); or,
  - 12.3.2. the period required for the retention of these records as set forth in the TAMUS Record Retention Schedule. Refer to TEEX SAP 61.99.01.99-1 (Record Retention).
- 12.4. TEEX business units shall be responsible for maintaining all documentation related to the shipment of items, goods, commodities, or technology to a foreign country under General License/NLR or EAR99, e.g., bills of lading, shipping receipts, inventory lists, packing lists, delivery confirmations, etc.

## **13. Penalties for Export Violations**

- 13.1. Violations of and non-compliance with U.S. export laws and regulations can have severe consequences and result in substantial criminal and civil penalties for both the individual and organization involved in the violation.
- 13.2. ITAR Criminal (Individual and Entity): Fines up to \$1 million per violation and/or up to 10 years in prison per violation.

- 13.3. ITAR Civil (Individual and Entity): Seizure and forfeiture of articles; revocation of export privileges; and fines up to \$500,000.00 per violation.
- 13.4. EAR Criminal (Entity): Fines up to \$1 million or five times the value of the export, whichever is greater, per violation.
- 13.5. EAR Criminal (Individual): Fines up to \$250,000.00 and/or 10 years in prison per violation.
- 13.6. OFAC Criminal (Entity): Fines up to \$1 million.
- 13.7. OFAC Criminal (Individual): Fines up to \$250,000.00 and/or up to 10 years in prison.
- 13.8. OFAC Civil (Individual and Entity): Fines up to \$250,000.00 per violation.

#### **14. Reporting Suspected Export Violations**

- 14.1. If a TEEX employee has reason to believe that a violation, or suspected violation, of U.S. export control laws or regulations or the TAMUS export control policy has occurred, or is about to occur, the employee shall immediately report the details of the suspected violation to the ECO.
- 14.2. In consultation with the TAMUS OGC, the ECO shall investigate any suspected violations of export control laws, regulations, or policies.
- 14.3. The ECO may declare the business activity or transaction under investigation to be in an “export hold” status until the investigation is completed by the ECO.

#### **15. Export Control Officer (ECO) Notifications**

The following are mandatory notifications and TEEX employees will immediately notify the ECO if any of the following events occur:

- 15.1. any non-routine contact (via telephone, email, or in person) by a U.S. government official or agency concerning any export matter;
- 15.2. a shipment from TEEX is detained or seized by U.S. Customs;
- 15.3. receipt of a subpoena or other criminal procedure notification related to U.S. export laws and/or regulations;
- 15.4. any red flag indicator (see Procedure 9.);
- 15.5. any violation, or suspected violation, of the U.S. anti-boycott laws and regulations (see Procedure 10.);
- 15.6. a suspected violation of U.S. export control laws and/or regulations or TAMUS export control policy (see Procedure 7.); or,
- 15.7. any requirement for U.S. government export licenses/approvals.

### **Related Statutes, Policies, or Requirements**

[Federal Regulation 22 CFR 120-130 International Traffic in Arms Regulations \(ITAR\)](#)

[Federal Regulation 15 CFR 730-774 Export Administration Regulations \(EAR\)](#)

[Federal Regulation 31 CFR 500-598 Office of Foreign Assets Control \(OFAC\)](#)

[System Regulation 15.02 Export Controls](#)

[TEEX Rule 15.02.99.N1 Export Management and Compliance Program \(EMCP\)](#)

[TEEX SAP 61.99.01.99-1 Record Retention.](#)

[TEEX eForm SES23SES Export Reviews and Assurance](#)

## **Appendix**

Appendix A *Export of Curriculum/TA Services Content Flowchart*

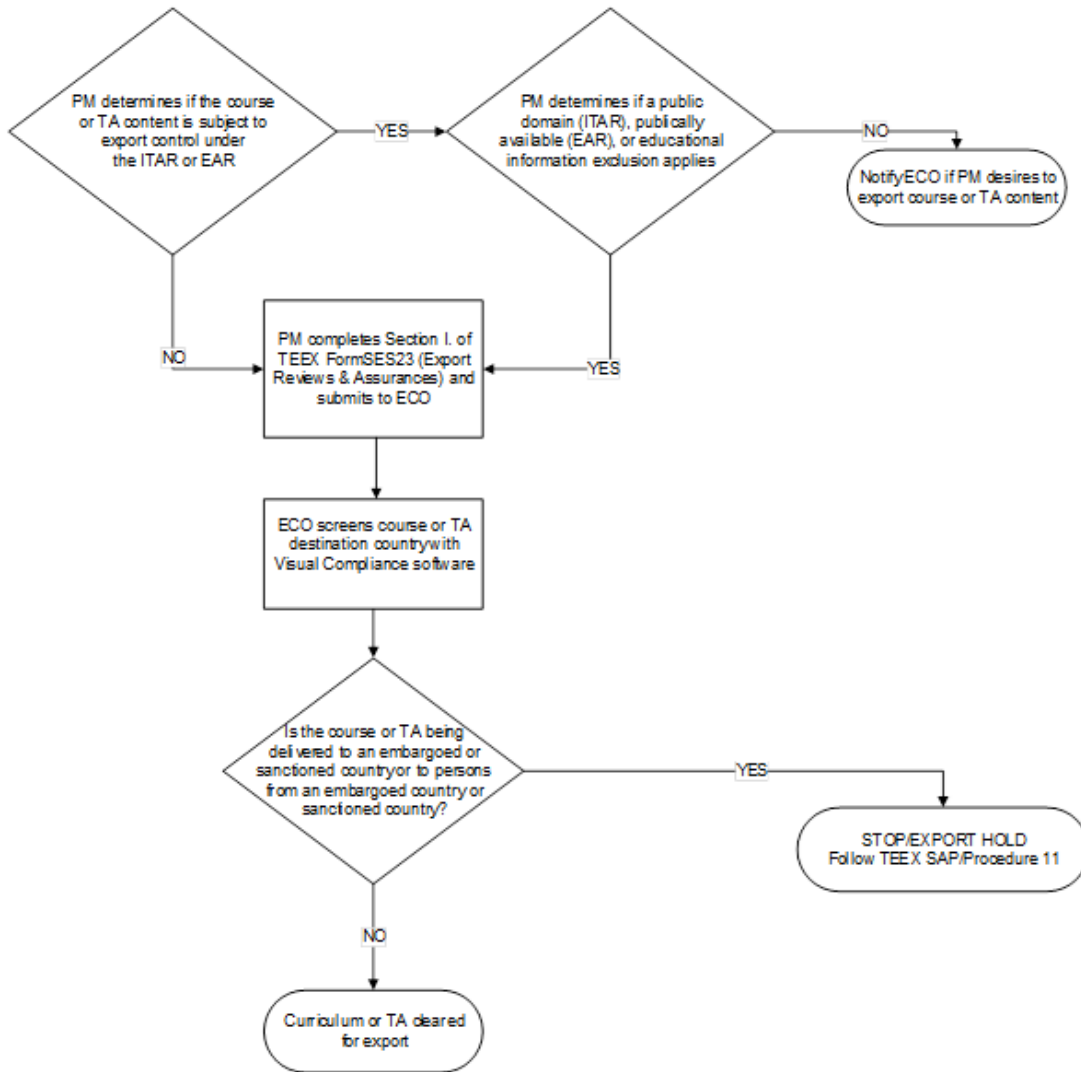
Appendix B *Export of Items Accompanying Curriculum/TA Services Flowchart*

## **Office of Responsibility**

Strategic and Education Service (SES)

(979) 458-6807

**Appendix A**  
**Export of Curriculum/TA Services Content Flowchart**



**Appendix B**  
**Export of Items Accompanying Curriculum/TA Services Flow chart**

