20. Issue Reporting and Notification

This Section addresses the process for confidentially reporting suspected export control violations.

CUNY makes every effort to identify suspected or actual violations that occur in conjunction with its export activities. All known or suspected export compliance problems should be documented in writing and reported to the University Director for Research Compliance. All reports are treated confidentially. It should be noted that timeliness of reporting is a key issue, since export violations are evaluated not only in terms of their content, but also frequency of occurrence, and system-wide implication.

Every instance of a suspected violation shall be reviewed by OVCR. The OVCR will notify all parties engaged in activities related to the given violation. Upon notification, all export shipments and releases of technical data related to the suspected issue must be placed on hold until otherwise authorized by the OVCR. OVCR shall escalate compliance issues to the Office of General Counsel as appropriate and consider Voluntary Disclosures as required. The Office of General Counsel shall give consideration to how and when it authorizes an investigative process in order to ensure Attorney Client Privilege.