CUNY Export Compliance Work Instructions: SHIPPING & RECEIVING

For ALL EXPORT shipments (licensed and non-licensed):

- Work with your Export Control Administrator and University Director for Research Compliance to screen freight forwarders against denied party software.

- Ensure that POAs with freight forwarders and customs brokers are current.

- Ensure that AES data (transmitted to US Government through the freight forwarder) is accurate.

- Maintain all required export recordkeeping (shipment documentation, AES confirmations, correspondence regarding export control, correspondence from customs authorities, etc.).

- Be aware of red flags that indicate potential export violation. Examples include:
  - Unauthorized changes to shipment destinations or consignees
  - Last minute changes to freight forwarder instructions
  - Any shipments to OFAC-embargoed countries (Cuba, Iran, Syria, Sudan) for which there is no license in place

For ALL EXPORT-CONTROLLED (EAR or ITAR) shipments, identified as such by the PI or Export Control Administrator:

- Consolidate all commodity shipments into a centralized shipping/receiving function.

- Segregate ITAR from EAR items to ensure that controlled items staged for shipping are not confused with each other.

- Compare shipping documentation (invoice, packing slip) against terms and restrictions of export license (allowable intermediary and final consignees) to ensure that exports conform to license.

- Confirm PI’s shipping instructions and license authorization with Export Control Administrator.

- Ensure that all invoice documentation bears a destination control statement: “Export Controlled: Diversion Contrary to US Law Prohibited”

- Ensure that Export license is properly lodged with Customs for outbound clearance (freight forwarder will advise on procedure).

- If Export license is an ITAR DSP73 temporary export license, confirm with PI when item will be returned to CUNY, and if it will be re-exported so that CUNY Shipping and freight forwarder are alerted to schedule.
For ALL IMPORT shipments:

- Ensure that customs broker is accurately instructed as to proper classification and valuation of imported items.
- Ensure that importer registration number is current with Customs.
- Ensure that Customs Surety bond is current and sufficient.
- Maintain all required import recordkeeping (shipment documentation, 7501 entry consumptions, and related broker-provided documentation).

For IMPORTED ITAR ITEMS (subject to ITAR licensing):

- Confirm with Export Control Administrator authority to import such items and ensure that customs broker is aware of such authority and necessary documentation prior to importation.