

<b>Export Controls and Sanctions – Standard Operating Procedures</b>	
<b>Export Controls and Sanctions SOP #005: International Shipping of Biological Materials Version 1.0 – April 30, 2024</b>	

## **INTRODUCTION**

This Standard Operating Procedure (“SOP”) outlines the processes and procedures used by the University of Missouri–Kansas City (UMKC) Environmental Health & Safety (EHS) to trigger an export control and sanctions review by the UMKC assigned UM System Research Security Officer (RSO) related to international shipments of biological materials.

## **PURPOSE**

UMKC EHS, in concert with the UMKC Institutional Biosafety Committee (IBC) residing within the Office of Research Services, engages in and assumes responsibility for the management of certain biological materials. This separation of power creates additional and complementary oversight with expertise. Because many biological materials, in particular those that are Select Agents, are highly controlled for export from the U.S., regardless of quantity or attenuation, an export license may be needed prior to transferring the biological materials outside of the United States. These mitigation procedures are implemented to protect both the university and its employees, ensuring compliance with export control and sanctions regulations when shipping biological materials internationally.

## **SCOPE**

To facilitate compliance with applicable U.S. Export Controls and Sanctions, this SOP establishes basic and minimal responsibilities for EHS, with the objective of providing an export control review standard for the international shipment of biological materials.

## **PROCEDURE**

From time to time, EHS may receive requests to assist with international shipments of biological materials. These shipments may trigger export control or sanctions concerns. EHS will engage the RSO for an export control and sanctions review.

## **RESPONSIBILITIES**

EHS and the IBC is responsible for:

- Notifying the UMKC RSO whenever they are aware of an international shipment of biological materials.

The UMKC Research Security Officer is responsible for:

- Performing restricted party screenings using Descartes Visual Compliance for all international parties engaged in an export transaction.
- Reviewing the Foreign Assets Control Regulations (FACR), as appropriate, to ensure that activities with sanctioned parties fit the terms of a General License.
- Working with EHS and/or relevant faculty members to self-classify items intended for international shipment.
- Ensuring that a license determination is performed for all exports that the RSO is facilitating.

- Partnering with the Director, Research Security and Compliance in the event that a license application needs to be submitted.
- For any activities that should not proceed, communicating with and coordinating with the Department Chair, Dean, or Vice Chancellor for Research, as appropriate.
- Providing periodic briefings to EHS on export controls and sanctions.

UMKC Investigators and Researchers are responsible for:

- Assisting the RSO in self-classifying any items intended for international shipment of biological materials.

## EXPORT CONTROL REVIEW AND ESCALATION

When shipping biological materials internationally, notification to the Research Security Officer (at [export.control@umkc.edu](mailto:export.control@umkc.edu)) is needed. The following steps are provided as a general guide to assist EHS and the IBC.

S1. Are you aware of an international shipment of biological materials?

- If Yes, contact the Research Security Officer and provide them with the name of the researcher, the contents of the shipment, and the name and country of the party that will be receiving the shipment, if known.

S2. After receiving approval from the Research Security Officer that an export license is not required or an export license has been obtained, proceed to assist the researcher with their international shipping needs.

## RECORDKEEPING

All export control recordkeeping will be managed by the Research Security Officer in accordance with SOP #001: Recordkeeping.

Previous Version Dates:	N/A
Signed by:	 Anthony Caruso, Ph.D. <span style="float: right;">04/30/2024</span> Interim Vice Chancellor for Research