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## **Guidance for International Shipments Export Control Compliance**

The following guidance and decision matrix has been established to assist faculty, staff, and students in the planning process for an international shipment of tangible/physical items. This guidance has been established to advise on the proper procedures to ensure compliance with Export Control regulations and requirements as defined in the Lehigh University [Export Control Manual](#).

Shipment of a tangible item to a destination outside of the United States (“international shipment”) is considered an Export. International shipments include, but are not limited to, equipment, materials, software item(s), etc. These requirements apply regardless of whether the item is sold, used for collaborative or individual research, loaned, donated, or shared with an entity or individual outside of the U.S., even if only temporarily.

All international shipments must be reviewed prior to shipping to ensure that a license is not required and that items are not being exported to a denied or restricted entity or individual<sup>1</sup>. Export control laws and regulations may require that Lehigh University obtain a license for the export of certain items. The Office of Research Integrity will assist you in assessing the need for a license and in preparing and filing required export and shipping documentation.

### **Restricted Party Screening**

The initial step in the process is to contact the Office of Research Integrity to perform restricted party screening. Restricted party screening **is required for all international shipments** regardless of item or destination. Please allow **at least 5-7 Business Days** for review and response before engaging in the planning and shipping process of the tangible item. [Contact the Office of Research Integrity](#) to request restricted party screening of the entity or individual recipient and/or end-user.

### **Decision Matrix**

The next step in the process is to review the decision matrix. After the restricted party screening has been completed, please use the following matrix to determine whether the item can now be shipped or if further review is required by the Office of Research Integrity. When reviewing the decision matrix it will be helpful to have the following information available:

- Complete description of the item(s) to be shipped internationally, including use, intent, and purpose of the international shipment
- Export Control Classification Number (ECCN) or United States Munitions List (USML) Category, if available (ECCNs and/or USML Categories can often be found on manufacturer’s websites or by contacting the manufacturer directly)
- Country of destination

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<sup>1</sup> Please refer to the [Sanctioned Countries](#) section of the Lehigh ORI web site for more information. This will inform you if the recipient and/or end user is in a country where a license may be required for international shipment.

- Name of recipient or end-user of item, including the name of the individual and the entity with which they are affiliated or employed
- Method of transport or shipping to be used
- Whether the item is connected to the performance of an external sponsored research award, and if so, the sponsor agency name and award number

The decision matrix is intended to collect information from the shipper (faculty, staff, or students) and self-certify about the “who, what, when, where, and how” of the international shipment.

If the answer to **all** of the questions below are NO, the shipper may proceed with the international shipment. If the answer to any of the questions below are YES, the shipper must email the information to the Office of Research Integrity at [inexport@lehigh.edu](mailto:inexport@lehigh.edu) for further review.

International Shipment Decision Matrix	Does the international shipment of an item need further review?	
	YES; contact the Lehigh Office of Research Integrity	NO; proceed with shipment
Did Restricted Party Screening performed for this shipment result in a match?	YES	NO (please see Restricted Party Screening above)
Does the item have an Export Control Classification Number (ECCN) or USML Category?	YES	NO
Is the shipping destination on the list of sanctioned countries found <a href="#">here</a> ?	YES	NO
Does the end use have a military or space application? <sup>2</sup>	YES	NO
Is there any indication that the item usage could compromise United States national security or foreign policy goals, regardless of the shipper's stated use?	YES	NO
Is the item owned by a third-party?	YES	NO
Is shipment of the item connected to the performance	YES	NO

<sup>2</sup> Tangible items with a potential military or space end use / application include nuclear explosives, power reactors for propulsion, rocket/missile launch or space launch vehicles, unmanned air vehicle activities (UAV), chemical or biological weapons. See [Export Controlled Items](#) for additional examples of export controlled items.

of an external sponsored research project (e.g. DOE, DOD, DARPA)		
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**Record Retention for International Shipments**

All records, including emails and expense receipts, associated with any international shipment must be retained as required by the applicable export control regulations for a period of five (5) years from the date of shipment.