



## West Virginia School of Osteopathic Medicine

### *Office of the President*

March 19, 2020

#### **Management Commitment Statement**

Dear Faculty, Staff, and Students,

WVSOM is committed to educating students from diverse background, supporting and developing graduate medical education, advancing scientific knowledge and promoting patient-centered, evidence based medicine. Though WVSOM is dedicated to serve, first and foremost, the state of West Virginia and its residents, and emphasizes primary care in rural areas, achieving these aims sometimes involves global engagement that is crucial to our student's education and our faculty's research endeavors. With this global engagement comes important legal obligations. The Federal government legislated the Export Controls Act ("ECA") and corresponding regulations, commonly referred to as the U.S. Export Administration Regulations ("EAR"), which are designed to protect U.S. national security interests. WVSOM is committed to compliance with all export controls in the Export Administration Act and the Export Administration Regulations. This commitment extends to promoting strict compliance on an on-going basis with its terms and conditions.

Critical to WVSOM's mission is education of students with diverse backgrounds, advancing scientific knowledge, and providing rural, primary care learning opportunities. To do so, WVSOM collaborates with international partners on educational opportunities, research, services, and hosts foreign visitors through a variety of activities. These are all important functions and WVSOM intends to continue to welcome all such collaborations in a manner consistent with the principles of its mission and Osteopathic medicine while also ensuring compliance with U.S. laws and regulations governing the export of certain items and information. Most of WVSOM's activities are exempt from these federal regulations governing export control through fundamental research exclusions or the information is already in the public domain. However, for those activities that are subject to the ECA, it is WVSOM policy that all employees comply with the United States export policies and regulations. Under no circumstances will exports or sales be made contrary to U.S. export regulations by any individual operating on behalf of WVSOM.

WVSOM has policies and procedures for export control compliance (R-07), which include a description of the types of activities that are subject to the ECA. WVSOM also provides annual training related to its Export Control Policy. I ask each of you to take this matter seriously and to support me in this effort. Please review the Export Control policy and procedures (the Export Control Standard Operating Procedures Manual) on an ongoing basis when you undertake a new activity or project, in order to understand export controls and possible noncompliance scenarios or risks.

I encourage you to reflect on the risks of unauthorized transfers for even low-level technology, as well as the possible penalties for violating Export Control regulations faced by WVSOM and you as an individual. For example, many cell phones, laptops, tablets, and other mass-market technology contain encryption software, which could potentially jeopardize national security or aid in the development of weapons of mass destruction. Additionally, doing business with, or providing goods or information to, persons or groups under US Sanctions is a violation of ECA. Penalties for non-compliance with Federal policy include loss of export privileges, disciplinary action, damage to reputation, and criminal or civil penalties. For example, civil penalties carry a minimum fine of \$250,000 and criminal penalties can be as high as 20 years imprisonment and \$1,000,000 fines.


In order to ensure compliance with WVSOM and Federal policy, if your project or activity involves:

- 1) international travel for work or academics, or
- 2) collaboration with foreign nationals within the United States, or
- 3) use of WVSOM equipment or resources while on vacation internationally (e.g. accessing WVSOM email while on vacation overseas),

Please complete an **International Travel or Collaboration Export Control Review** form and return it to the Institution's Export Compliance Manager for review. The Institution's Export Compliance Manager is Dr. Jandy Hanna and she is a resource if you have any questions about international work or collaboration. Her contact is (304) 647-6366 ([export@osteo.wvsom.edu](mailto:export@osteo.wvsom.edu)). If you are travelling for WVSOM purposes, the Information Technology Office may provide a laptop that is appropriately configured for security while in the international arena, rather than your school-issued computer.

Also note that if you are travelling for personal reasons but still planning on accessing WVSOM email or resources while abroad, you are still expected to adhere to WVSOM institutional policy R-07 (Export control) and institutional policy GA-31 (Acceptable use of information technology resources). These include that **no** personally identifiable information (PII), HIPAA, or FERPA data should be stored on your personal devices. Additionally, information on best practices when travelling with personal technology items is available at <https://www.wvsom.edu/ORSP/ORSP-Export-Control>. If you have questions about this information, WVSOM's IT office is available to assist you.

Sincerely,



Edward Bridges, Ph.D.

Vice President for Administration and External Relations

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