



Global Watch®

THE NEWSLETTER OF THE INTERNATIONAL IMPORT-EXPORT INSTITUTE
AT DUNLAP-STONE UNIVERSITY
19820 NORTH 7TH STREET, SUITE 100, PHOENIX, ARIZONA USA 85024

SEPTEMBER/OCTOBER 2016, VOLUME 15, ISSUE 4

Reasons Why Export Violations Abound

Government experts say export violations happen for a variety of reasons. They report there is no single major reason such as a lack of knowledge or training. Yet, when you look for reasons, there tends to be a hierarchy of causal factors. Here are a few:

Ignorance of the law – Particularly for small companies in the supply chain of large prime exporters, ignorance of the law is unfortunately common. Even though prime contractors require their vendors to be ITAR compliant and to know the EAR often there is a lack of depth in the knowledge at small firms.

Corporate Priorities: Senior managers set the priority for compliance investments low. They say the odds are we won't get caught. In some instances, the attitude is "If we get caught then we will worry about the fines."

Lack of Training – Inadequate training on the regulations and their use can lead to violations.

Incomplete Knowledge – cursory training without the foundation knowledge of how to properly apply the regulations can result in violations. Often companies send their employees to the latest update conference where the current changes are explained, but when an employee lacks the foundation knowledge of the regulations from beginning to end the employee often mistakenly put the latest changes at the front of their mind. Violations seldom happen because of the latest changes.

Lack of Process controls – Failure to have checks and balance to ensure proper licensing efforts can result in

Violations - Continued on page 5

Paying For College – An Affordable Solution that can Result in Little or No College Student Debt

The cost to attend college has continued to rise as schools all across America have once again increased the tuition cost for the 2016 school year. The cost to attend a public university in many states is similar to what Arizona State University charges: Annual tuition is \$25,468 for out of state students, making the cost over \$100,000 for a four year degree, not including room and board. To attend an Ivy league school costs can be over \$69,000 per year. The result of these rising costs has made it very difficult, if not impossible, for families seeking a higher education for their children to pay for the education their children deserve.

When these costs are added to graduate school costs, the financial burden is often so great that a student is crushed for decades under the huge debt once he or she graduate and begins working in their chosen profession such as law or medicine.

Many families don't want their children to attend community colleges that specialize in providing job skills. They want a university education with rigorous academic standards that leads directly to a bachelor degree, not just an associates degree.

Servicemember and Military Veteran Scholarship recipients receive 25% of tuition discount

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Dunlap-Stone University (DSU) offers a solution to families who have found the cost of higher education is simply not affordable or that do not want to saddle their children with enormous student debt. DSU offers bachelor degrees in management, healthcare administration and logistics as well as trade compliance law. The most popular bachelor degree at colleges across the nation is a business management degree. If families did

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Notes from the President

Compliance Education as a Driver

by *Dr. Donald N. Burton*



I am continually hearing comments from students who have completed the Master Degree in Export Compliance here at Dunlap-Stone University that the job offers they are accepting greatly surpass their wildest dreams. Some get offers for advancement to much higher levels within their existing companies because of their academic pursuits with us. Kudos. That is personally rewarding to me—to see our students advancing because of our school and their efforts.

It should not surprise me really. When I think about how our industry is maturing so quickly and the demand for managers with proven experience and advanced academic degrees that align with the knowledge needs of today's trade compliance sensitive employers.

As this issue of GlobalWatch® shows, we are having an increasing number of graduates earning their Bachelor degree with an emphasis of Trade Compliance Law. I applaud them all. This further demonstrates how the industry is maturing. In some ways, it is a warning to those who are early in their compliance career and still don't possess this coveted bachelor degree. As this is the beginning of another school year, it is not too late for these folks to transfer their old college credits to DSU and discover their graduation date. Most likely if they are transferring in credits, they are much closer to graduation than they would

think. There is no cost to have your status evaluated. So check it out.

The number of people we help prepare for their industry certification exams is growing. Along with our global training partners we help people all over the world prepare for their international trade industry exams with our education content. The amazing part of this to me is we are helping people everywhere facilitate trade that is safe and smooth flowing. If you haven't kept up with the CEUs for your certification, remember taking one class directly at Dunlap-Stone completely meets the requirement for an entire year for CUSECO holders. And with over 60 different trade compliance related courses to choose from, there is sure to be an online course that will meet your knowledge needs.

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BIS and DDTC Harmonize Destination Control Statements, Make Other Clarifying Changes August 31, 2016

On Aug. 17, 2016, as part of the President’s Export Control Reform (ECR) initiative, the Department of Commerce, Bureau of Industry and Security (BIS) and the Department of State, Directorate of Defense Trade Controls (DDTC) issued final rules (here and here) to harmonize the Destination Control Statement (DCS) required under §758.6 of the Export Administration Regulations (EAR) and §123.9 under the International Traffic in Arms Regulations (ITAR), respectively. This change, along with several more minor edits, is intended to simplify export clearance requirements for exporters, in particular those with mixed shipments consisting of both EAR and ITAR items. The final rules will become effective on Nov. 15, 2016.

Destination Control Statements

The purpose of the DCS is to notify parties outside the United States that receive an item that the item is subject to U.S. export controls, the item was exported in accordance with the EAR or ITAR, as applicable, and that diversion contrary to U.S. law is prohibited. Prior to the final rules, both the EAR and the ITAR mandated the inclusion of a slightly varied version of the DCS on the export control documents for shipments that included items subject to both sets of regulations. In contrast, the harmonized DCS will adopt

language equally applicable under the ITAR and the EAR, and which must be used for all shipments, regardless of whether such shipments consist of only ITAR, only EAR, or a mix of ITAR and EAR items. The final DCS language applicable under the ITAR and the EAR will be as follows:

These items are controlled by the U.S. Government and authorized for export only to the country of ultimate destination for use by the ultimate consignee or end-user(s) herein identified. They may not be resold, transferred, or otherwise disposed of, to any other country or to any person other than the authorized ultimate consignee or end-user(s), either in their original form or after being incorporated into other items, without first obtaining approval from the U.S. Government or as otherwise authorized by U.S. law and regulations.

While the term “authorized” as used in the final DCS language includes exports, re-exports and transfers (in-country) designated as No License Required (NLR), the phrase “country of ultimate destination” means the country specified on the commercial invoice where the ultimate consignee or end user will receive the items as an “export.”

Under the final rules, the DCS will only be required with the commercial invoice and will no longer have to be included on the air waybill, bill of lading or other export control documents. The DCS will only be required for shipments from the United States of tangible items subject to the EAR, including exports authorized under NLR. A DCS will not be required for exports of EAR99 items or items exported under License Exception BAG or GFT. In addition, for shipments of 9x515 or “600 series” items exported in tangible form, the Export Control Classification Number (ECCN) of each item will need to be included on the commercial invoice. When a commercial invoice exists for intangible exports, BIS does not require, but instead recommends, as a good compliance measure, the inclusion of a DCS, all ECCNs and other relevant export control information.

Other Changes

The final BIS and DDTC rules make other changes to the existing regulations to include the following:

Removing from the EAR a provision requiring a special DCS for items controlled under ECCNs for crime control columns 1 and 3 reasons, or regional stability column 2 reasons when

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BIS Update NEWS and Sanctions

TWO MEN SENTENCED IN SCAM TO ILLEGALLY EXPORT GOODS TO SYRIA

The United States Attorney's Office for the Middle District of Pennsylvania announced that Harold Rinko, age 74 of Hallstead, Pennsylvania and Ahmad Feras Diri, age 43, of London, United Kingdom were sentenced by United States District Court for their involvement in a conspiracy to illegally export goods to Syria. Diri, age 39, of London, United Kingdom, was sentenced yesterday to a 37-month term of imprisonment, a \$100 special assessment, and ordered to forfeit \$45,698 to the government. On October 13, 2016, Rinko was sentenced to a term of time served, 12 months of home confinement, a fine of \$2,600, a term of supervised release of 2 years, and was ordered to forfeit \$45,698 to the government. A third defendant, Moawea Deri, a citizen of Syria, remains a fugitive from justice. Rinko operated an export business in Hallstead, Pennsylvania and conspired with Diri to ship items purchased by customers in Syria in violation of United States law. The three men conspired to export various items from the United States, through third party countries to customers in Syria. More.

Source: https://www.bis.doc.gov/index.php/forms-documents/doc_view/1573-rinko-diri-sentencing

Commerce Control List Classification

Determination as to whether or not authorization is required to export is determined by the following criteria in the transaction: 1) what is the ECCN of the item; 2) where it is going; 3) who is the end-user; and 4) what is the end-use. While the majority of U.S. commercial exports do not require a license, the first step in this process is determining the correct classification of your item.

If your item is subject to the jurisdiction of the U.S. Department of Commerce, you must then determine if your item has a specific [Export Control Classification Number \(ECCN\)](#) found on the [Commerce Control List \(CCL\)](#). Keep in mind that items subject to the Export Administration Regulations (EAR) that are not listed on the CCL are designated EAR99

There are three ways to determine the Export Control Classification Number (ECCN) for your product.

1. Go to the Source.

Contact the manufacturer, producer, or developer of the item you are exporting to see if they have classified their product and can provide you with the ECCN. If they

have exported the item in the past, it is likely they have the ECCN. Keep in mind that ECCNs may change over time, so please review the ECCN to be sure you are in agreement.

2. Self-Classify.

In order to perform a self-classification, you must have a technical understanding of your item, and you need to be familiar with the [structure and format of the CCL](#). The CCL is divided into ten categories, represented by the first digit of the ECCN. Each of the ten categories is divided into five product groups, represented by the second digit of the ECCN. Once the appropriate category and product group are identified, match the particular characteristics and functions of your item to one of the specific ECCNs that follow.

You can also utilize the [Commerce Control List Index](#) to

Control Lists *Continued on page 9*

Major Export Enforcement Case Summaries

can be viewed at:

www.pmdtc.state.gov/compliance/documents/OngoingExportCaseFactSheet.pdf

[Click link for Document](#)

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DDTC Update

Directorate of Defense Trade Controls

Industry Notice: Commodity Jurisdiction (CJ) Submission through EFS

Effective Wednesday, November 16th at 5PM EST, The Department of State will no longer use the Electronic Form Submission (EFS) application to accept Commodity Jurisdiction (DS-4076) applications. Beginning Monday, November 21st at 8AM EST users will submit CJ applications via the Defense Export Control and Compliance (DECCS) CJ application.

Agreement Guidelines Update:

Revision 4.4b of the Guidelines, which will become effective November 15, 2016, has been posted Go to:

<https://www.pmdtcc.state.gov/licensing/documents/AgreementGuidelinesRev44b.pdf>

22 CFR Part 121 Revision: Final Rule

Department of State amends the International Traffic in Arms Regulations (ITAR) by revising Category XII (fire control, laser, imaging, and guidance equipment) of the U.S. Munitions List (USML) to remove certain items from control on the USML and to describe more precisely the articles continuing to warrant control on the USML. The Department also amends USML Categories VIII, XIII, and XV to reflect that items previously described in those Categories are now controlled under the revised Category XII or Commerce Control List. Further, the Department revises USML Category XI to move items to the CCL as a result of changes to related control in USML Category XII. This rule is effective on December 31, 2016.

Source: <https://www.pmdtcc.state.gov/FR/2016/81FR70340.pdf>

Violations- Continued from page 1

violations. Sometimes violations occur because of process failure. With the increase in regulations over the past few years, simple checks and balances may not be enough. In compliance today, having rigorous, in-depth and independent audits and controls are critical in maintaining compliance.

Human error – No matter how much knowledge a compliance professional has, human error is a factor in countering violations. In smaller companies, without layers of compliance experts to cross check and validate exports, human error can be a problem.

Poor Teamwork - Poor teamwork across the organization, such as compliance staff member at remote facilities assuming their office in Washington will catch any errors, can be a serious source of violations. Every member of the compliance team needs to know the regulations completely and take on the responsibility as though there was no backup. The team should not be limited to the compliance staff alone—every member of the organization should have a defined role in their job description that ensures their support of trade compliance. This means total organization involvement in maintaining compliance.

Resource allocation – Having an adequate budget for personnel to manage compliance is

often one of the biggest contributors to causing a violation. In many companies, large and small, compliance personnel work 10 to 12 hour days in their eight-hour salaried position. Under staffed compliance departments with over-worked compliance personnel are more likely to make last minute human errors that lead to violations.

These are only a few of the potential sources of violations. Failure to prevent violations, no matter what their cause can result in a company being debarred from exporting, cause management to go to prison or for the doors to be closed on the business forever. Trade compliance requires a company wide effort from the top down. It starts with providing knowledge workers with the in depth knowledge of the regulations needed to ensure compliance and does not end once their knowledge level has been validated through independent means. Compliance is an ongoing process that ensures that no matter what new regulations are established, the whole organization will be in compliance.

By DSU Staff

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Violations - Continued on page 9

In Compliance....

Compliance Is More Than You Think

By Dr. Egbert Hubmann

Compliance Management is more than just following the letter of the law. It is an important factor in business success, writes Egbert Hubmann – Procurement expert.

Preventing Misconduct

In international Procurement, companies have to face more and more regulations and standards. For this reason, compliance is becoming more and more important for global companies.

But this is not just about standards. It also means stopping misconduct across the system. It is important to understand ethics, integrity, governance, and Corporate Social Responsibility. Companies need to bring all this together with great care. The risk that misconduct in your business or supply chain could go public is greater than ever before. It could even become international news.

What's more, because much legislation is international, law breakers could face international punishment. The risks and costs

are simply too high not to take seriously. This is where Compliance Management comes in.

Here are four best practices derived from my experience in global companies:



1. Make compliance a commitment

Compliance Management cannot just be words or policy – it has to be real. Employees across all departments must live compliance every day. It also needs to be long-term. The long view is highly valued by international regulators.



2. Make it measurable

A key part of real Compliance Management is making it measurable. You have to be able to measure it against objective criteria and make comparisons. Because of this, companies need to prove the

number of training sessions they have held. They also need to record the number of employees trained, partner reviews and management reports completed.

Compliance Continued on page 7

Trade Compliance requires a company wide effort



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Compliance *Continued from page 6*



3. Work in a team across your company

There must also be cooperation and teamwork between company departments. This includes Legal, Accounting, Internal Audit, HR, Communication, and Procurement. This is a team effort, because it is the responsibility of all management areas.



4. Implement beyond your company

This goes beyond your company to your relationships with your business partners. Forward-looking compliance management should cover the full value chain and corporate structure. This goes over national borders, both at home and abroad. In state-of-the-art companies, Procurement and Compliance work together in order to take care about supply chain processes and to reduce risks. This helps you avoid unclear contracts, unethical behavior, or breaches of antitrust law.

The Prize: Success

If you can face up to risks in critical markets and countries, this is a great reason for customers to choose you. And not just customers, but also business partners, banks, investors, and employees.

Compliance Management has the potential to develop from a cost to a success factor. For more and more companies, this is the ace of CSR. In addition, compliance strategy protects you against the costs that can result from misconduct.

It's time to start ensuring business success for the future.

About the Author

Dr. Egbert Hubmann is a Procurement expert. He has 30 years of



experience in Procurement, Supply Chain, and Consulting in different management positions in international companies. On top of this, he is lectures in Procurement at the University of Mannheim.

Exporting Basics Class Makes Compliance Staff Members More Valuable

A growing number of logistics companies are having their members enroll in Exporting Importing Environment class (TRD-201) so that they understand their customers' needs.

This very popular, hands-on class teaches all nine steps of the exporting process from the perspective of a need to know how to do it. For more information look online and speak with a enrollment advisor.

Federal Register 81 FR 64657
09/20/16

Wassenaar Arrangement 2015 Plenary Agreements Implementation, Removal of Foreign National Review Requirements, and Information Security Updates

This final rule amends the Commerce Control List of the Export Administration Regulations by implementing the changes agreed to by the Wassenaar Arrangement (WA) at the 2015 Plenary by revising 58 Export Control Classification Numbers (ECCNs) and adding two ECCNs, as well as adding a General "Information Security" Note, revising WA reporting requirements, adding four (4) definitions, removing three (3) definitions, and revising twelve (12) definitions in the EAR. This rule also adds license exception eligibility for two (2) ECCNs and removes license exception eligibility for four (4) ECCNs. This rule also raises the Adjusted Peak Performance (APP) for high performance computers, as well as technology and software for the development and production of such computers. In addition, this rule updates license requirements and policies associated with Category 5 – Part 2. Lastly, this rule removes the Foreign National Review requirement associated with deemed exports under License Exceptions APP and CIV.

For the complete rule:
https://www.bis.doc.gov/index.php/forms-documents/doc_download/1560-81-fr-64657

What is the first thing you should do when you discover a violation?

Validated End-User Program

Authorization as a Validated End-User (VEU) reduces the licensing burden on industry by allowing U.S. exporters to ship designated items to pre-approved entities under a general authorization instead of under multiple individual export licenses.

Being approved for VEU status enables entities in VEU-approved countries to receive U.S.-controlled products and technologies more easily, quickly, and reliably.

Validated End-Users:

Receive shipments of designated items subject to the EAR on an expedited basis. After receiving an order from a Validated End-User for an item listed in the EAR as eligible for that Validated End-User, any exporter may immediately ship that item under Authorization VEU instead of having to apply for an individual validated license.\

Have more certainty and reliability regarding the receipt of items subject to the EAR that are included in their VEU authorizations. If an item is included in an entity's VEU authorization, there is no uncertainty about whether a license application will be approved because individual licenses are not required for the shipment of pre-approved eligible items to Validated End-Users.

Please see the following for specific information on the Validated End-User program at <http://www.bis.doc.gov/index.php/licensing/validated-end-user-program>:

- 748.15 Authorization Validated End-User (VEU)

Control Lists *Continued from page 4*

navigate the CCL. Begin by searching for your item on the CCL Index. When you find a potential ECCN, you must then read through the ECCN entry on the CCL before determining if your item fits into the parameters of that ECCN. If the ECCN contains a list under the "Items" heading, broken down into subparagraph(s) it is important to read through these subparagraph(s) to determine that your item meets the technical specifications listed in the ECCN category. You may need to review more than one ECCN description before you find the correct ECCN entry.

Read [Part 738](#) of the EAR for specific instructions on how to use the CCL. You can also access our [Introduction to Commerce Department Export Controls](#), which is an easy-to-follow guide that walks you through the classification process step-by-step.

3. Request an official classification from the Bureau of Industry and Security (BIS).

Submit a commodity classification request online through the [Simplified Network Application Process - Redesign \(SNAP-R\)](#). You must obtain a Company

- Federal Register notice inaugurating the VEU Program (15 CFR 33646)

- Supplement No. 7 – List of Validated End-Users

- Supplement No. 8 – Information Required in Requests for VEU Authorization i

- Supplement No. 9 – End-User Review Committee Procedures

- VEU application template

- Validated End User Program FAQs/

Identification Number (CIN) before accessing the online SNAP-R system and submitting your request.

You can also access our [Guidelines to Reexport Publications](#) to gain more insight into what information you should provide at the time of your request.

4. What if my product is not listed?

After careful review of your item against the CCL, if you are convinced your item does not fit into the parameters of any ECCN, your item may be designated as EAR99, keeping in mind it is not controlled by [another agency](#). If this is the case, your item may be exported using the license exception NLR specifying no license is required, as long as all of the following criteria is met:

o The item is not being shipped to a [sanctioned destination](#)

o The item is not being shipped to a [denied person, sanctioned entity, or prohibited end-user](#)

o The item will not be used for a specific [end-use](#), subject to higher controls.

For further details on these export restrictions, read Parts 736, 742, 744, and 746 of the EAR. If you still need guidance, you may contact the Outreach and Educational Services Division at (202-482-4811) or the Western Regional Office at (949-660-0144). While BIS can provide oral advice and guidance, we cannot give definitive classifications over the phone.

Source: <http://www.bis.doc.gov/index.php/licensing/commerce-control-list-classification>

**Export Control Reform
Decision Tree Tools**

The USG Exporter Tools:

Commerce Control List (CCL)

Order of Review

The CCL Order of Review Decision Tool will assist users in understanding the steps to follow in reviewing the CCL.

<http://www.bis.doc.gov/index.php/export-control-classification-interactive-tool>

“Specially Designed” - EAR

600 Series

The Commerce “Specially Designed” Decision Tool will assist users in determining if an item will be “specially designed” under the Export Administration Regulations.

<http://www.bis.doc.gov/index.php/specially-designed-tool>

Strategic Trade Authorization

(STA) License Exception

The Strategic Trade Authorization (STA) tool will help users of the License Exception STA determine if they are eligible to use and will be in compliance with License Exception STA.

<http://www.bis.doc.gov/index.php/statool>

“Specially Designed” - ITAR

The State’s “Specially Designed” Decision Tool will assist users in determining if an item will be “specially designed” under the Export Administration Regulations.

http://www.pmdtdc.state.gov/licensing/dt_SpeciallyDesigned.htm

Order of Review - USML

The USML Order of Review Decision Tool will assist users in understanding the classification steps for the International Traffic in Arms Regulations.

http://pmdtdc.state.gov/licensing/dt_OrderofReview.htm

**All URLs listed above
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Considering the Masters Degree Program?

Assuming you already have a bachelor degree, there are several other important considerations when applying for entrance into the masters degree program. First, only enroll if regulatory trade compliance law is your career choice. It is really important that you have some experience in the industry or you won’t be able to keep up. This program was designed to provide the in-depth skills and knowledge needed

by senior managers who are responsible for the oversight of all aspects of regulatory trade compliance laws that impact the movement of goods and services across national borders and throughout the global supply chain. These programs are at the graduate level. That means they require more effort than undergraduate courses. They help prepare you to work in the 21st century global world.

Rules - Continued from page 3

those items are destined to India;

Adding to various provisions of the ITAR clarifying language pertaining to the use of exemptions to the license requirements and the export of items subject to the EAR, when the EAR items are shipped with items subject to the ITAR (including guidance on the use of license exemptions for the export of such items, and clarification that items subject to the EAR are not defense articles, even when exported under a license or other approval issued by DDTC);

Clarifying the requirements for retransferring items subject to the EAR pursuant to a request for written approval from DDTC;

Clarifying that shipments of commingled commodities may be made under exemptions or license authorizations;

Removing the requirement to provide seven (7) paper copies for various export license requests;

Changing the identification of the agency responsible for permanent import authorizations of unclassified U.S.-origin defense items from the Department of the Treasury to the Department of Justice;

Removing the pilot requirement in the ITAR, given that it does not take into account modern airport operations and is no longer necessary; and

Adding to the ITAR a provision for requests to interpret ITAR requirements.

Recommendations

Companies have approximately three (3) months to take necessary actions needed to

modify their export compliance procedures to comply with these rules. Exporters are expected to update automated systems and forms. Companies that rely upon manual processes to generate commercial invoices should review the new DCS and adjust pro forma export control language. In addition, training should be provided regarding the changes required for both manual and automated systems.

For more information on the material presented in this alert, please contact Melvin Schwechter at mschwechter@bakerlaw.com or 202.861.1559, Kerry Scarlott at kscarlott@bakerlaw.com or 202.861.1585, Matthew Caligur at mcaligur@bakerlaw.com or 713.646.1355, Lana Muranovic at lmuranovic@bakerlaw.com or 713.646.1338, or your BakerHostetler relationship contact.

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Source: <https://www.bakerlaw.com/alerts/bis-and-ddtc-harmonize-destination-control-statements-make-other-clarifying-changes>

Paying for College - Continued from page 1

have their children attend DSU online, work part time to help pay for their education, their children could finish college with little or no student debt. If graduate school is wanted, the most popular graduate degree in America is an MBA. Students could earn their MBA at Dunlap-Stone University.

The cost of attending DSU is a small fraction of what it costs to attend a premiere Ivy League school, about \$40,000 for the entire bachelor degree tuition. If an immediate family member is a veteran of any era, there is a 25% discount, making the total cost of a bachelor degree under \$30,000. Families typically pay for classes out-of-pocket one at a time; some have short breaks in between classes as they budget the costs. This enables students to graduate with their bachelor degree with no student debt.

Dunlap-Stone has had students accepted into law schools and other graduate programs. If students are seeking to attend graduate school after DSU they should speak with the school of choice to make sure they will meet the course and enrollment requirements of that school.

One aspect parents like for their children and themselves is they already know what to expect in courses at DSU. That familiarity removes the stress about deciding whether their children should attend Dunlap-Stone.

Contact an enrollment advisor for details.

Classes Starting Soon

October 2016

- TRD-340 Importing Munitions
- TRD-311 Documentation for Export Compliance
- TRD-505 Export Fundamentals
- TRD-520 Trade Compliance Special Circumstances
- TRD-528 Trade Compliance Treaties and Guidelines

November 2016

- HAS-240 Shakespeare I
- TRD-319 Managing Disclosures
- TRD-325 UK: Export Controls
- TRD-307 Understanding the EAR
- BUS-401 Global Culture
- BUS-440 Legal Environment of Business
- FAE-450 International Economics
- HCA-133 Introduction to Public Health
- MGT-135 Introduction to Leadership
- MGT-335 Modern Management Principles
- MGT-345 Organizational Behavior
- SCM-412 Global Supply Chain Strategies
- STM-160 Statistics in Business
- TRD-140 Importing Duties and Regulations
- TRD-311 Documentation for Export Compliance
- BUS-204 Innovation and Entrepreneurship
- TRD-141 Introduction to Incoterms (R) 2010
- TRD-308 Mastering ITAR Exemptions
- TRD-330 Export Compliance Audits

December 2016

- TRD-257 Empowered Official Essentials
- TRD-306 Understanding the ITAR
- TRD-307 Understanding the EAR
- TRD-311 Documentation for Export Compliance
- TRD-540 Management of Trade Compliance
- TRD-550 MSc Capstone Thesis
- TRD-141 Introduction to Incoterms (R) 2010
- TRD-320 Ethics in Trade Compliance
- TRD-306 Understanding the ITAR

"Open Enrollment" Opens the Door Wide

Dunlap-Stone University's (DSU) "Open Enrollment" policy allows anyone who meets the school general administration requirements to enroll in any course or courses for which they meet the course prerequisites. Most of the school's students register for courses under Open Enrollment, while declaring which course of

study they are pursuing—such as certification exam preparation training for the Certified U.S. Export Compliance Officer® exam. Open Enrollment is a simple and easy way to take classes immediately.

What many students don't realize is that the vast majority of students who are currently enrolled in the bachelor degree program at DSU began as Open Enrollment students. What makes this so attractive is that many of the compliance related courses are

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BS - Trade Compliance Law
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LL.M - U.S. Regulatory Trade Law

Contact an enrollment advisor to get your ticket punched

either required in the bachelor degree program or can serve as elective credits in the degree program. After a few years of taking classes to fill knowledge gaps under Open Enrollment, students discover that they are well on their way to finishing their bachelor degree. All it takes to be in the degree program of your choice is to contact your enrollment advisor. They will help you declare your major and most importantly determine your graduation date.



Dunlap - Stone University

Professionally Significant Degrees®

Educational Advisory Committee Seeks Nominees

For the last 20 years, Dunlap-Stone University has worked with industry professionals to align its curriculum in international trade and trade compliance topics with the real-world needs of industry. Due to the tremendous growth of the university's compliance education programs and the continued professionalization of the industry, we are expanding the process. You can assist in this effort by lending your voice. We need to know your ideas and concerns.

We invite you to select a representative from your organization to serve on Dunlap-Stone University's virtual Advisory Committee (AC). The AC committee is comprised of up to 20 compliance leaders and subject matter experts from leading organizations with an interest in setting compliance knowledge parameters for their workers. This is an opportunity to have a voice in the future direction of accredited college education within the trade compliance industry and at Dunlap-Stone. More precisely, committee members have direct input into the courses and programs that benefit your workers, organization, and industry. The committee helps the university determine the breadth and depth of the knowledge taught to meet industry's needs, both today and in the future.

Participation requires a limited time investment. The term of service from a committee member is two years. Committee membership is

selective, although to gain a range of viewpoints and expertise, both large and smaller organizations and a range of industry sectors will be represented. To nominate an individual to serve on Dunlap-Stone University's Advisory Committee, include the nominee's name, contact information, and resume for review.

The relationship between DSU and the trade compliance industry extends almost twenty years. Thank you for helping to ensure that the courses and programs we offer continue to meet the needs of those we serve. Please feel free to forward this invitation to your organization's senior compliance leaders/ decision makers.

Contact

Dr. Caulyne Barron
Chief Academic Officer
Dunlap-Stone University
cbarron at dunlap-stone.edu

How Much Should You Know?

One of the most often asked questions when people new to compliance call the school is "How much should I know to be a good compliance professional?" Perhaps the best answer is "What do you need to know to do your job and advance in your career." Simply stated: The more validated knowledge you possess in this profession the more valuable you are to your employer.

MBA Program Starts Late Fall Term

Already known for its quality international business programs, Dunlap-Stone University is proud to announce its new Master of Business Administration program with an International Management emphasis. This graduate program is designed for early and mid career professionals who want to better understand and operate within a global business environment. The program is now enrolling students for its November 15th cohort start date. The program consists of nine eight-week courses that are taken sequentially, so the typical student will complete the program in a year and a half (72 weeks).

The 36 graduate credit hour program follows DSU's widely acclaimed online instructional design model. The asynchronous 24/7 program is ideal for students juggling the demands of their professional life, careers, family, and more.

Students interested in applying must have a bachelor's degree from a post-secondary institution accredited by an accrediting body recognized by the US Department of Education. Students must also meet general admissions requirements and the program's prerequisites. Provisional entry may be granted as students work to meet prerequisite requirements, which can be completed at DSU.



Dunlap-Stone University Degree Graduates

The following individuals are congratuated on completing the degree requirements for the following degrees:

Bachelor of Science - International Trade Management

Master of Science - Export Compliance

Joshua Clepper

Emphasis: Trade Compliance Law
Graduating Summa Cum Laude

Claire Hoberecht

Emphasis: Trade Compliance Law
Graduating Magna Cum Laude

Brittany Thigpen

Emphasis: Trade Compliance Law
Graduating Cum Laude

Cynthia Whitecotton

Emphasis: -Trade Compliance Law
Graduating Magna Cum Laude

John Chew

Graduating: Magna Cum Laude

Valerie Chu

Graduating: Summa Cum Laude

Wendy Epley

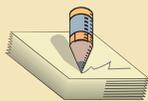
Graduating: Summa Cum Laude

Barbara Flynn

Graduating: Summa Cum Laude

Stephanie Wood

Graduating: Summa Cum Laude



Dunlap-Stone University Student Honor Roll

The students shown here have demonstrated outstanding "A" performance .

Honor - Distinction - Excellence

Connie Allen
Leopold Alvarez
Luis Bongiovi
Dexter Camille
Nicole Castellanos
Michael Caudill
Natalia Cepeda
Tameika Chalmers
Lisa Chapin
John Chew
Joshua Clepper
Kendra Cook
Carole Coolman
Ryan Dow
Carolyn Ellis
Wendy Epley
Sarah Fonstad
Rada Gaynullina
Janice Glad

Christina Huelsman
Bradley (Ryan) Jone
Marina Joyce
Nicholas Kaneelos
Andrea Kelley
Jennifer King
Ji Kinnear
Carol Knepper
Laura Koss
Patricia Lataxes
Connie Leemasters
Scott Long
Dana Madhu
Helia Maritato
John McCullough
Thomas McKelvey
Steven Montgomery
Steven Morris
Shirlene Moyer

Colon Ng
Kelley Peachey
Soimita Persa
Thomas Phillips
Jayakumar Pillai
Roberta Ramadas
Roseann Reece
Laura Roberts
Cheryl Rockwell
Jon Ross
Paula Saunders
Gisela Schaefer
Beth Schroll
Steven Spurling
Amy Styers
Korrie Thomas
Cassandra Toney
Brenda Trinka
Joseph Turner

Bret Ulibarri
Sherry Wagers
Janet Wallett
Theresa Wiechman
Nikki Wilson
Yegor Yelenchak

Congratulations to these Outstanding Students.

Your Dedication, Perseverance and Hard Work are to be commended. Well done!



The International Import-Export Institute

at *Dunlap-Stone University*

19820 North 7th Street, Suite 100

Phoenix, Arizona USA 85024

Phone: (800) 474-8013 Outside U.S. (602) 648-5750

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