Guidance on Shipping Materials to Students to Support Remote Learning

Carnegie Mellon University

Working Group

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Statement of Issue

- *"We need to be flexible in our educational approach for fall of 2020 so that students can participate in person or remotely depending on their personal situation and so that we can be prepared for fluid conditions of the pandemic." Jim Garrett, June 2nd Preparing for Fall Instruction*
- In keeping with the goal to offer as many of our in-person courses with remote participation options, for some classes physical materials and supplies may need to be available to students who are not on campus or in Pittsburgh.
- Materials, supplies, and equipment may need to be shipped to students, including to students who are not in the US. Software may need to be made available to students who are not on campus.
- This poses safety, regulatory, legal, and logistical challenges.
- It may also raise financial and inclusive practice issues.

Examples of materials used in classes that might not be available to those participating in their education remotely

For a ‘wet lab’ class	Equipment, chemicals, prepackaged lab kits
For a ‘dry lab’ class	Equipment, construction materials or components, specialized adhesives
For a ‘technology’ class	Electronic components or materials, batteries, Arduino kits, potentiometer, breadboard, sensors, switches, motors, LEDs MP3 player, micro SD card, USB cable, microcontroller, hot melt adhesive,
For a ‘studio’ class	Fabric, construction materials, adhesives, paint, solvents, needles, thimbles, beeswax, thread, tailors chalk, wool, silk, balsa wood, clay
For a ‘lecture/recitation’ class	Project materials, specific type of notebooks or bluebooks

Software (which isn’t necessarily shipped) could be for any type of class

Challenges in sending materials to students who are taking the class remotely

- Does the material present a risk to the student or others? Is the material hazardous? Could it be combined with other common items to become hazardous if misused? Is the material a DOT dangerous good?
- Does shipment of the material require additional attention to comply with regulations? Is the material export-controlled? Is the student in an OFAC country?
- Does the material/ item require special shipment or labeling? Is specific labeling required (i.e., batteries)? Are components/ materials available in individually labeled containers/packages?
- Who will pay for the materials and the shipping? If the department is supplying the materials and covering the shipping costs, is adequate budget available? If the student is buying the materials, does financial aid need to be available to support these costs for some students?

Step 1

Consider whether alternative approaches to meet the course objectives exist. These may be needed if the materials cannot be shipped, do not arrive for all students, or students are unable to complete the assignment with the materials remotely due to limitations in their remote location or other issues.

Questions to consider:

- Is the material, component, item or device a central feature in a course outcome?
- Are there alternative ways to meet the educational outcome?
- How do you plan to meet the outcome if we pivot to full remote?

Consult with:

- Colleagues
- Department Head
- Department Liaison to Eberly
- Consultant at Eberly
  eberly-assist@andrew.cmu.edu

Step 2

If after due consideration, the instructor decides shipment of materials to remote students is important to meet a course outcome that cannot be met through alterative means, a series of analyses are necessary to determine IF and HOW such shipment would be accomplished.

Determination of whether shipment to remote students can be considered

Is there a student registered for the course who will be in an OFAC country during the instructional period?

Heather Bragg (Hbragg@andrew.cmu.edu) can assist with determining this.

- Yes → **Do Not Ship to students in OFAC countries**
- No → Is the material hazardous? A hazardous material is any item or agent (biological, chemical, radiological, and/or physical), which has the potential to cause harm to humans, animals, or the environment, either by itself or through interaction with other factors. (Check the MSDS for details)

Contact safety@andrew.cmu.edu with questions.

- Yes → **Do Not Ship**
- No → Is it deemed a dangerous good (by DOT)? A dangerous good (also known as hazardous material or hazmat) is any substance or material that is capable of posing an unreasonable risk to health, safety, and property when transported in commerce.

Contact safety@andrew.cmu.edu with questions.

- Yes → **Do Not Ship**
- No → Is the item, material, equipment on the list of items likely to be approved with minimal review (see list).

- No → Review for export-control or labeling requirement must be conducted. Contact **export-compliance@andrew.cmu.edu**
- Yes → Is it commercially available for purchase at the individual level (with labeling)? Is a KIT commercially available for use?

- Yes → **Likely OK**
- No → Are components commercially available (and individually labeled) and CMU personnel will only be assembling the materials into kits for shipment?

- Yes → **Likely OK**
- No → Are the materials purchased in bulk and CMU personnel will be opening packages and dividing into smaller unlabeled units for shipment?

- Yes → Are there any powders or liquids?
  - Yes → Can you identify a commercially available (and individually labeled) alternative?
    - Yes → **Likely OK**
    - No → **Do Not Ship**
  - No → **Likely OK**
- No → The material you are shipping is unclear. A review must be conducted. Contact export-compliance@andrew.cmu.edu

Under These Circumstances, Shipment is Fully Prohibited

No shipment is permitted to a country covered by U.S Sanctions. (e.g., Cuba, Iran, North Korea, Sudan, and Syria)	Heather Bragg (Hbragg@andrew.cmu.edu) can assist with determining if a student in your class is located in an OFAC country.
No shipment of hazardous materials is permitted. A hazardous material is any item or agent (biological, chemical, radiological, and/or physical), which has the potential to cause harm to humans, animals, or the environment, either by itself or through interaction with other factors. (Check the MSDS for details).	Contact Environmental Health & Safety (EHS) (safety@andrew.cmu.edu) with questions or to discuss specific materials.
No shipment of materials considered "dangerous goods" by the US Department of Transportation. A dangerous good (also known as hazardous material or hazmat) is any substance or material that is capable of posing an unreasonable risk to health, safety, and property when transported in commerce.	Contact Environmental Health & Safety (EHS) (safety@andrew.cmu.edu) with questions or to discuss specific materials.
No shipment of technology, software or technical data outside the US that is subject to the Export Administration Regulations (EAR) and International Traffic in Arms Regulations (ITAR). Note: ORIC will need to review the specific items to be shipped in order to determine compliance with EAR and ITAR.	ORIC will need to review the specific items to be shipped in order to determine compliance with EAR and ITAR. Contact export-compliance@andrew.cmu.edu

Do Not Ship

If materials cannot be shipped, how will you modify the course activity for students who are Remote?

Return to Step 1 → Step 1

Questions to consider:

- Is the material, component, item or device a central feature in a course outcome?
- Are there alternative ways to meet the educational outcome?
- How do you plan to meet the outcome if we pivot to full remote?

Consult with:

- Colleagues
- Department Head
- Department Liaison to Eberly
- Consultant at Eberly
  eberly-assist@andrew.cmu.edu

Likely OK

For materials that are not prohibited and that have been approved by the export-control review, there are some things that will make providing the materials simpler.

If the materials are available in a commercially prepared KIT and students will be instructed to use the kit exactly as instructed by the manufacturer, this is a good approach. No modifications of the instructions are allowable.

If the materials or kits are commercially available for purchase at the individual level (with labeling), and students can make the purchases directly themselves (via an online retailer or through the CMU Store), this is a good approach.

If the materials or components are commercially available (and individually labeled) and CMU personnel can assemble the materials into kits/packages for shipment, the CMU Store can assist with this work.

If the materials are purchased in bulk and CMU personnel will be opening packages and dividing into smaller unlabeled units for shipment, this may be a concern. We recommend identifying commercially available and individually labeled alternatives. If this is not possible, consult export-compliance to determine if appropriate labeling can be created. export-compliance@andrew.cmu.edu

For international shipping, a customs invoice will needed. Reach out to export-compliance@andrew.cmu.edu early to discuss this form.

Likely OK

Approaches for Students to Access Materials

(After export control assessment has been conducted and shipment is permissible)

How will students who can receive the material accesses it?

- ❑ Students acquire the item from a local source.
- ❑ Students order commercially-available item (or kit) from identified/specified vendor that ships directly to student. Student pays for item and shipping.
- ❑ Students order commercially-available item from CMU store that ship direct to student (The CMU store can work with faculty members to build a new vendor relationship, which will take some time and co-ordination). Student pays for item and shipping.
- ❑ CMU department orders commercially-available item from vender (directly or through CMU Store) and vendor ships individually directly to students. Department pays for item and shipping. Contact cmu-bookstore@andrew.cmu.edu
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- ❑ CMU department orders commercially-available items from vender and works with CMU Store to assemble kits and ship to student. Department pays for materials, CMU Store work to compile kit, and shipping. Contact cmu-bookstore@andrew.cmu.edu [This is an existing service]
- ❑ CMU department purchases components and builds/assemble kits and ships those kits (only if components are individually packaged and labeled by vendor). CMU Store can assist with sourcing packaging. Postal Services or Tartan Ink can assist with shipping. Department pays for materials, packages them, and pays for shipping. Contact cmu-bookstore@andrew.cmu.edu or Andrew Zucker in Postal Services 8-5616.
- ❑ Other. Please discuss with Environmental Health & Safety (EHS) (safety@andrew.cmu.edu) and Export Control (export-compliance@andrew.cmu.edu) before pursuing another option.

Step 3

Once you have determined how the students will access the materials, consider how you will communicate about this process.

- ❑ How will students learn that they need to order the material? (on syllabus, on web site, direct link to vendor?)
- ❑ How can the students who are not able to receive the material (for any reason) participate/ have an alternative experience? Are there alternative ways to meet the educational outcome if the material or supply does not arrive? Consult with Eberly to assess alternatives. Contact: eberly-assist@andrew.cmu.edu

Step 4

Consider Pivot-Issues:

- Students who were remote arriving to campus late
- Students who were in person having to go into quarantine
- Campus pivoting back to remote-only in response to government order.

For those who begin the semester remote:

- ❑ What about return to campus? Once they are able to enter the country, would they be able to bring materials back?
- ❑ How will students ship materials they have already done work on? Consider size of materials?
- ❑ What about closures of local shipping outlets?

For those who begin the semester in person:

- ❑ Should each in-person student be given a kit as well to ensure she/he/they can pivot to remote easily?
- ❑ Should additional remote kits be ready to ship/deliver for students who have to pivot to remote for quarantine?

Are approaches different if the entire campus pivot's to remote?

- ❑ Should each in-person student be given a kit as well to ensure she/he/they can pivot to remote easily?
- ❑ Should additional remote kits be prepared to give to students as they leave campus if there is a remote-pivot?

Step 5

Consider the financial implications of the requirement that materials be purchased by the student or shipped by the university

Do students usually purchase this material or pay for it through lab fees?

Does the department usually pay for this directly?

- If students in-person do not have to pay this cost, and remote students have to purchase these items for direct ship to themselves, how should we reconcile that issue?
- Where will these costs (materials and shipping) be borne within the university (dept, college, university?)
- How will financial aid support be considered for these materials (e.g., increasing the cost of attendance to allow additional aid to be provided)?

Items that can be Shipped EAR99/NLR for Remote Instruction

Some of the items below are not necessarily subject to export controls, but can be shipped without the level of review required for more controlled items.

Books
Business documents
Clothing
CMU branded items

Supplies, general office/art/architecture
Board: card, foam, modeling pulp, drawing, chip
Brushes: assorted sizes and applications
Clay: modeling, paper
Clips, metal, plastic: paper, binder
Containers: portfolio, clear plastic, jars, spray bottle, bucket, general storage
Crafts and Sewing: Notions, yarn, textiles and accessories; non-conductive fabric and thread
Drinking straws
Hardware, metal, plastic, composite: bookbinding posts, screws, washers, nuts, bolts, bushings, nails, fasteners, spacers, springs (compression/extension), clips, grips, and connectors
Lights: LED, dimmable, clamp
Marbles, non-metal
Mat, cutting
Mouth atomizer (spray diffuser)
Palette tray (plastic, metal, enamel)
Paper: rolls, pads, reams, note/sketchbooks, swatches; butcher, newsprint, specialty (Stonehenge, Thai Kozo), palette, sand, printmaking, colored, watercolor, multi-media
Personal Protective Equipment (disposable consumer goods packaged for retail sale and personal use): Safety goggles, face shields, face masks, gloves, gowns, aprons, shoe coverings
Push pins
Staples
Rope/String/Twine: cotton, synthetic, natural-fiber
Tape: Artist, pH neutral, gaffer/ing, masking, electrical, cellophane, duct
Tools, Hand: Wire cutter/stripper, pliers, scissors, tweezers, hammer, mallet, staple gun, binder's needles, awl, Jeweler's Loupe, utility/cutting blade, grips
Tools, Paint: canvas, stretcher bars, sponge, tarp, palette knife, palette tray
Tools: Clay, Sgraffito, clean-up
triangles, marking knives (X-acto), drafting tape, pencils (wood and mechanical), erasers, lead, sharpeners, charcoal, tortillions (blending stumps), carbon disc), pens (artist sets, quills, nibs, holders, Micron, brush)
Waxed linen thread
Wire: sculpture (various gauges)
Wood: tongue depressors, balsa, dowels, popsicle sticks, skewers

Back

Paint, Solvents, and Chemical-Based Items	Hazardous	Can be Shipped
Acetate film, Duralar	N	Y
Acrylic Retarder-Golden	N	Y
Adhesives: pH neutral	N	Y
Adhesives: School (Elmer's), stick (all-purpose and hot melt), mouldable, iron-on (HeatnBond)	N	Y
Adhesives: Super Glue, Loc-tite, Krazy Glue, Gorilla, Tacky, fabric	Y	Y
Gamblin PVA Sizing	N	Y
Gesso Golden	N	Y
Ink: liquid, waterproof, Sumi, India, calligraphy	Y	Y
Latex, liquid (for theatrical/special effects make-up)	N	Y
Make-up Set: special effects/stage	N	Y
Markers: water-based, China, non-toxic	N	Y
Matte medium (for use with acrylic paint)	N	Y
Paint (sets) : acrylic, Gouache, watercolor, wax pastels, artist crayons	N	Y
Spirit gum and remover	N	Y

Back

Items that can be Shipped EAR99/NLR for Remote Instruction
Electronics, Equipment, Software and Technology
Batteries, Alkaline: AA, AAA, AAAA, C, D, N, 9V
Batteries, Rechargeable: NIMH, NICD
Cables, Jumper
CD/DVD Drive, Portable
Charger, Battery, Portable
Docking Stations
Earbuds and headphones, wired and some wireless
Ethernet Cables
External/Portable Storage Drives/SSHD
Gamepads and Joysticks
Keyboards, wired and some wireless
Memory Cards (SD/Micro SD, MMC/CF Cards)
Microphone, wired and some wireless
Monitors (including touch panels)
Mouse, wired and some wireless
MP3 Player
Power Cords and Supplies: AC/DC, 500W or less, 5V or less
Speakers, wired and some wireless
USB Cables, Portable
USB Chargers and Power Adapters, Portable
USB Flash Drives, Portable

Back