

Export Control Review Procedures

All awards:

1. Review project description for:
 - nature of work
 - sponsor (defense, commercial?)
 - military application
 - evidence of potentially controlled items/technology (such as sensors, biochemical hazards, super-computers, etc.)
2. Review proposal (including budget) for:
 - involvement of sanctioned countries
 - foreign travel
 - any portion of work being conducted off-campus
 - any portion of work being conducted out of U.S.
 - export of any materials/products out of U.S.
3. Review export control checklist (required for specific schools/depts)
4. Review award/contract:
 - access/dissemination controls
 - NDAs, other confidentiality requirements
 - receipt of controlled technology required for research
5. If project involves no export from U.S. of “items,” no involvement of restricted countries, and no publication/access restrictions that would compromise FRE, no further analysis is required.
6. Recordkeeping: maintain all documentation for award file and OSP central file

Awards with “red flags” require further analysis:

1. Negotiation with Sponsor related to problematic clauses, as necessary.
2. If FRE applies to project for information/technology, but (a) project involves export of items, or (b) project requires receipt of export-controlled equipment/technology:
 - identify whether items/technology are on lists. Begin with Visual Compliance review.
 - If No, no further analysis/action required.
 - if Yes
 - identify end-use and end-user
 - determine license requirements
 - assess for license exemptions
 - notify OSP Director and/or OGC
3. If project involves sanctioned parties:
 - determine applicable regulation(s) (ITAR, EAR, OFAC). Begin with Visual Compliance review.
 - determine the exact nature of project activity, including travel
 - determine license requirements
 - assess for license exemptions
 - notify OSP Director and/or OGC
4. If FRE does not apply, notify OSP Director.
5. Complete appropriate review form (Review Summary and/or License Review) and attach all notes/documentation. Maintain all documentation for award file and OSP central file.