

**Export Controlled Technology Control Plan
Fillable Form**

CONFIDENTIAL: This Record is Exempt from Public Records Disclosure pursuant to Iowa Code §22.7(50) and §22.8, as well as ISU's policy on Security-Related Information.

Date of plan:

Proposed Period of work: -

Management Plan expiration:

Title of sponsored project/activity:

Contract or grant number:

RESPONSIBLE INDIVIDUAL for implementing & monitoring plan:

RESPONSIBLE INDIVIDUAL work address:

RESPONSIBLE INDIVIDUAL phone:

RESPONSIBLE INDIVIDUAL email:

List and describe each export controlled technology:

PART 1: PLAN ELEMENTS

1. **Physical Security:** Export controlled technology and sensitive project data—collectively referred to as “EC Materials”—must be physically controlled to avoid unauthorized access.
 - a. **Location:** Appropriate measures must be taken to secure controlled electronic information, including controls on access to information and transmission of information.
 - b. **Item Marking:** EC Materials must be clearly identified and marked as such.
 - c. **Physical Security Measures:** Provide a detailed description of your physical security plan designed to protect EC Materials from unauthorized access, ie., secure doors, limited access, security badges, CCTV, etc.
 - d. **Shipping or Transfer:** Prior to shipping or transfer—whether domestic or international—of any physical items which are export controlled (including electronic media), a determination must be made whether the recipient is permitted to receive the items. The determination will be made through the Office of Research Integrity (ORI). Transfers to persons approved under this Management Plan are excluded from this requirement. Additional controls, if any, include:

2. **Information Security:** Appropriate measures must be taken to secure controlled electronic information, including controls on access to information and transmission of information. Storage of export controlled technical information on cloud servers and email is prohibited.
 - a. **IT Security Plan:** Describe the information technology (IT) security for data and other export-controlled information.

 - b. **Transmission Protocols:** Describe whether export-controlled information will be transmitted electronically or physically and the protocols for secure transmission.

 - c. **Conversation Security:** Describe protections from employee transfer to unauthorized persons by conversation with unauthorized persons, such as confidentiality agreements, disclosure forms, exit procedures when persons leave the project, agreements with external collaborators, etc.

3. **Project Personnel:** Clearly identify each individual, together with citizenship or immigration status of persons who are to have authorized access to EC Materials:

Name and Citizenship/Immigration Status:
Name and Citizenship/Immigration Status:
Name and Citizenship/Immigration Status:

4. **Training:** Appropriate measures will be taken to ensure that all project personnel have completed appropriate training in export control compliance. Personnel will require a refresher course every four years.

Name and Training Date:
Name and Training Date:
Name and Training Date:

5. **Record Keeping Requirements:** EAR and ITAR have specific record keeping requirements that must be met. Generally speaking, any documentation or record related to an EAR or ITAR controlled project, shipment, agreement, license or license exception/exemption must be maintained for 5 years after the project, shipment, agreement, license or license exception/exemption has been finalized. Specific record keeping requirements can be found in the following regulations:

ITAR:

22 CFR 123.22—Filing, Retention and Return of Export Licenses and Filing of Export Information
22 CFR 123.26—Recordkeeping Requirements for Exemptions
22 CFR 124.4—Deposit of Signed Agreements with DDTC

22 CFR 124.5—Proposed Agreements that are not
Concluded

22 CFR 124.6—Termination of Manufacturing License Agreements and Technical Assistance
Agreements

EAR:

15 CFR 762.1 – Records to be retained

Additional Comments:

PART 2:

1. Determination of Export Controlled Status

Person making determination:

Phone number:

Reason for determination:

ECCN or ITAR USML:

2. Confirmation of Personnel Screening Procedures

- a. **Confirmation of Denied Persons Screening:** Project personnel, subcontractors, and subcontractor personnel must be checked to assure such persons or entities are not banned from participation.

Date of screening:

Method of screening:

Person conducting screening:

- b. **Determination of Need for Export License for Persons/Entities with Access:** If any personnel are not US Citizens, permanent residents, or otherwise in a permitted standing under export control regulations, a determination must be made through ORI whether export licenses are required. If required, the Office of University Counsel will apply for the appropriate licenses.

Date of determination:

Person conducting screening:

Names of persons for whom export licenses are required:

- c. **Special Sponsor Requirements:** If Sponsor has more stringent requirements than required by Export Control Regulations, indicate the restriction here.

X

RESPONSIBLE INDIVIDUAL/PROJECT PERSON...

X

PROJECT PERSONNEL

X

PROJECT PERSONNEL

X

Department/Unit Head

X

Brooke Langlitz
Director, Office of Research Integrity