



ORA RECORD of EXPORT CONTROL REVIEW

Note: If any questions in Section A are 'yes', ORA personnel should forward this document to the PI to complete Sections B and C and then return to: Elaine Major, Director of Institutional Compliance 215 Wannalancit MIL, 600 Suffolk Street or to Elaine_Major@uml.edu

Project Title:
Name of Principal Investigator:
Department and School/College Affiliation:
Sponsor Name:

A. Agreement Review (For completion by ORA):

Does the agreement contain any clause that:

- 1. References U.S. export regulations? Yes No
- 2. Restricts participation based on citizenship or country of origin? Yes No
- 3. Prohibits access by non-U.S. citizens to project information? Yes No
- 4. Prohibits the hiring of non-U.S. persons? Yes No
- 5. Restricts publication of research results? Yes No
- 6. Grants sponsor a publication approval right? Yes No
- 7. Grants sponsor a right to prepublication review that is more than just a right to review for sponsor proprietary information or for patent protection? Yes No
- 8. Allows sponsor to claim research results as proprietary or trade secret? Yes No

Completed by: _____ Date: _____

If "Yes" is indicated on any of the questions above, the PI must complete part B, Technical Review.

B. Technical Review - PI should complete and return this form to the Director of Institutional Compliance, Elaine Major at ext 3452 or Elaine_Major@uml.edu

To PIs: It has been determined that the sponsored agreement for the project identified above contains provisions that may require University compliance with export control laws and regulations that are issued by the Department of Commerce and/or State. A final determination of the application of those regulations to this particular project depends on whether the research falls within a category of technology the government has determined raises particular issues of national security or economic interest. As the PI for the project, you are the person most qualified to decide if your research falls within covered areas.

Procedures: Review descriptions of technologies that are controlled by the International Traffic in Arms Regulations (ITAR), 22 CFR Sec 121.1, and the Export Administration Regulations (EAR), 15 CFR Sec 774 Supp. 1 (categories 0-9), and decide if the technology involved in this particular project falls within one or more of those categories. Links to the regulations as well as information on export control laws and how they may affect University research can be found under Export Controls at www.uml.edu/ora/institutionalcompliance. Please check both the Commerce Control List (EAR) at <http://www.access.gpo.gov/bis/ear/pdf/738.pdf> and the U.S. Munitions List (ITAR) at <http://www.fas.org/spp/starwars/offdocs/itar/p121.htm>. Review this information and then complete Section C below.

C. I have reviewed the relevant EAR and ITAR regulations and determined that this project either:
 Does not involve technologies that are covered by either the EAR or the ITAR, is designated “EAR 99”, or the Fundamental Research Exemption applies. (If this box is checked, sign below and return to Sponsored Project Administrator);

OR

May involve technologies that are covered by either EAR or ITAR. If this box is checked, read the *Briefing on the Handling of Export-Controlled Information*, and sign below indicating you read and understand the briefing.

D. Technology Control Plan (TCP): Based on the answer to “C” above, a TCP may be required. The Office of Institutional Compliance will make this determination. If one is required, a TCP must be in place before any work may begin on the project. The PI is responsible for ensuring that all project personnel read the *Briefing on the Handling of Export-Controlled Information* and sign the TCP. If a license is required, foreign nationals may not begin work on the project’s controlled technology until the license is in place.

Note: To add any Foreign National to a restricted project that has an approved TCP, the appropriate section of the TCP must be revised and re-submitted for review and approval by the Office of Institutional Compliance before the person may begin any work on the project.

(For completion by OIC) TCP not required TCP required

PI Signature: _____ Date:

Office of Institutional Compliance Signature: _____ Date: