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. Prohibits 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 □

Actions taken by ORA as a result of Agreement Review:
1. Contacted sponsor to negotiate out export control language or clauses Yes □ No □
   Outcome:
2. Contacted sponsor to specify reason for control, jurisdiction and ECCN or USML Yes □ No □
   Outcome:
3. Contacted Assistant Vice Chancellor for Research for authorization to accept this research that will invoke export controls. Yes □ No □
   Outcome:

Completed by: Date:

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

B. Technical Review by PI- PI should check complete and return this form to Joanne Zanella-Litke
   jzanella@umassd.edu

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 that 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.

For more information, contact Joanne Zanella-Litke at jzanella@umassd.edu
Procedure: Please 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 determine 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 http://www.umassd.edu/grants_contracts/compliance/main.cfm. 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.

After your review of the relevant EAR and ITAR regulations, check one of the following boxes and return to the Office of Institutional Compliance. I (the PI) have concluded that this project:

☐ 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 checked, sign below and return to ORA);

PI Signature: _____________________________ Date:

OR

☐ Does involve materials or technologies that are covered by either the EAR or ITAR. If checked, read the Briefing on the Handling of Export-Controlled Information, and sign below to indicate you read and understand the briefing. (If checked, return to Office of Institutional Compliance and you will be contacted to develop a TCP.)

PI Signature: _____________________________ Date:

D. Technology Control Plan (TCP): Based on a positive answer to “C” above, a TCP may be required. The Office of Research Compliance will help make this determination. If one is required, it 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 to verify they have read and understand the briefing. If a license is required, the ORC will also assist in the application process. 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

Office of Research Compliance Signature: _____________________________ Date: