

SECURE AND GLOBAL RESEARCH PROCEDURES

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Colorado State
University

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Introduction

A core value of Colorado State University is openness in research and the free dissemination and publication of research results and findings. It is the practice of Colorado State University to comply with all United States industrial security regulations as well as export control laws and regulations governing the transfer of controlled tangible items, software, technology, and information to a foreign national or to a foreign country. Research, scholarly, and other activities of the University are subject to these export controls. Responsibility to these compliance areas and regulations apply to individuals as well as institutions, and these procedures are in place to help CSU faculty, staff and students comply. Violations can lead to fines or penalties to the individual and/or the University. If a person seeks to export a controlled item or technical data, the person must first secure the appropriate license(s) or approvals in accordance with these procedures and all policy approved by the Office of Vice President for Research.

Policy

Colorado State University leadership supports this mission by clearly addressing and prioritizing these areas of compliance through the university's Policy Library. The Office of Policy and Compliance maintains the Policy Library, in which these policies reside.

Colorado State University established Export Control Policy 7-2001-009. The policy applies to all employees of the University and mandates the creation and maintenance of Export Control Procedures (ECP).

Colorado State University established Classified Research Policy 7-2001-007. The policy is intended to further elaborate on requirements outlined in the Faculty and Administrative Professional Manual.

Purposes

The purpose of this document is to provide background, guidance and procedures to facilitate compliance with United States industrial security and export control laws and regulations at Colorado State University; to establish the procedural framework for handling export control and classified matters; and to clarify the responsibilities of certain departments and individuals with respect to those requirements.

As these regulations can change rapidly, this document will be updated as needed to help CSU faculty, staff and students comply with the standard, overarching goals and requirements outlined in the CSU Export Control Policy and CSU Classified Research Policy.

Risk Assessment

The Secure and Global Research office conducts an annual risk assessment to identify and mitigate possible areas of risk related to export controls and classified facility maintenance. Procedures and programs within this office are regularly updated to address new or continued areas of risk. The basic procedures and functions of this office are described in detail in the procedures sections below.

Procedures: General

- (1) Although these procedures are meant to help CSU employees navigate common situations on campus, not every situation can be predicted and outlined. It is the responsibility of all CSU employees to help identify unique situations that involve related compliance needs.
- (2) Secure and Global Research, with support of the Empowered Official are the only CSU entities that can submit applications for federal export licenses.
- (3) If any CSU employee thinks a violation has occurred, they must alert the Secure and Global Research Office.

Procedures: Secure and Global Research Office

Oversight and Management

SGR is responsible for establishing and maintaining a campus-wide export and classified compliance program by:

- (1) Maintaining procedures that follow regulatory requirements outlined in the Export Control Administration Regulations, International Traffic in Arms Regulations, Office of Foreign Asset Controls, and the National Industrial Security Program Operating Manual.
- (2) Completing an annual risk-assessment highlighting current and emerging risks in export compliance, classified research compliance, and secure access and continuing or designing programs and processes to address them.
- (3) Identifying export-controlled items, technology and information that exists within the university system and responding to each unique circumstance appropriately.
- (4) Identifying secure access needs in the forms of common access cards (CACs) controls and serving as a resource for CSU customers.
- (5) Collaborating with and requesting feedback from campus partners on current processes and interactions related to export control, classified research, and secure access needs.
- (6) Maintaining registration with Directorate of Defense Trade Controls.

Training

SGR is responsible for providing export control and classified facility training to CSU campus by:

- (1) Offering CITI Training Module access to all CSU-affiliated faculty, staff and students.
- (2) Providing specific in-person lab and department training.
- (3) Providing individualized Technology Control Plan (TCP) briefing and training.
- (4) Providing required export compliance training to CSU Empowered Officials.
- (5) Providing required annual security briefings to cleared personnel.

Licensing

SGR is responsible for applying for and securing appropriate export licensing by:

- (1) Submitting, with authorization from a CSU Empowered Official, all export license requests to the Department of State, Department of Commerce, and Department of the Treasury on behalf of CSU employees and students.
- (2) Making determinations to apply for licenses use specific export license exemptions or general licenses and documenting appropriately.

- (3) Requesting and securing required information from CSU employees and students to prepare license applications and fulfill documentation requirements.

Recordkeeping and Retention

SGR is responsible for making export compliance determinations, providing documentation to the impacted CSU exporter and maintaining documentation by:

- (1) Maintaining electronic record retention in Quali Research and the SGR CSU shared drive.
- (2) PIs and others around campus are also responsible for maintaining copies of export determinations provided by SGR.

SGR is responsible for maintaining secure facility requirements and oversight of cleared personnel records, and maintaining accurate documentation by:

- (1) Maintaining access to federal secure facility management programs.
- (2) Maintaining accurate records regarding the secure facility and CSU-sponsored cleared personnel.

Applicable recordkeeping standards include:

- (1) Adhering to Export Administration Regulations recordkeeping requirements, [15 CFR §762](#).
- (2) Adhering to International Traffic in Arms Regulations recordkeeping requirements, [22 CFR §123.26](#); [22 CFR §123.22](#); [22 CFR §122.5](#).
- (3) Adhering to Office of Foreign Asset Controls recordkeeping requirements, [31 CFR §501.601](#).
- (4) Adhering to National Industrial Security Program facility and personnel recordkeeping requirements, [DoD 5220.22-M, incorporating Change 2](#).
- (5) Adhering to CSU retention requirements, referencing federal requirements in [CSU Policy 5-6001-005](#).
- (6) Adhering to other mandated recordkeeping policies, as applicable.
- (7) Without superseding guidance, SGR's general policy is to maintain all secure facility and export related records for a minimum of five (5) years.

Audit

SGR is responsible for guaranteeing reliable and complete oversight by:

- (1) Evaluating Technology Control Plans, licenses, license exemptions on a predetermined cycle as noted in each unique, official record.
- (2) Conducting regular audits of our secure facility, and participating in regular Security Vulnerability Assessments with the Defense Security Service.
- (3) Conducting an annual, internal Risk Assessment including reviews of current programs and processes.

Violations

If SGR is aware of any violation, they are responsible for reporting to the responsible federal agency and creating action plans to correct any issues and prevent further violation by:

- (1) Working closely with federal agencies such as the Federal Bureau of Investigation, Defense Security Service, Bureau of Industry and Security, Directorate of Defense Trade Controls, Office of Foreign Asset Controls, and others.

- (2) Working closely with CSU leadership, specifically the Vice President for Research.
- (3) Working closely with CSU General Counsel.
- (4) Following federal procedures in the case of a violation; including communicating with the impacted individual(s), submitting Voluntary Disclosures and/or creating internal documentation.

Background: Export Control

With respect to Export Control compliance in a university setting, the regulations that are primarily of concern are:

- International Traffic in Arms Regulations (ITAR) enforced by the Department of State under 22 CFR §§ 120-130. These cover defense related articles and information used for military purposes such as: explosives, chemicals delivery systems, and biological agents.
- Export Administration Regulations (EAR) enforced by the Department of Commerce under 15 CFR §§ 730-774. These cover everything else such as grain, office equipment, automobiles, software and computers.
- Office of Foreign Assets Control (OFAC) Regulations enforced by the Department of the Treasury under 31 CFR §§ 501-598. These cover economic sanctions and general embargoes, and limit any exports to certain countries.

Licenses from the U.S. government are only required for items listed as export-controlled that are also being exported in any form to a restricted country or associated foreign national. While the vast majority of exports do not require prior approval, some may require government issued licenses or application of a license exemption.

Important to higher education institutions, license exceptions exist in both the ITAR and EAR for fundamental research and information considered to be in the public domain. Similarly, an educational information exclusion applies to catalog courses and teaching labs.

An export can be any of the following:

- Actual shipment of any covered goods or items;
- The electronic or digital transmission of any covered goods, items, or related goods or items;
- Any release or disclosure, including verbal disclosures or visual inspections, of any technology, software or technical data to any foreign national wherever located; or
- Actual use or application of covered technology on behalf of or for the benefit of any foreign entity or person.

Procedures: Export Control

The following sections describe specific export compliance procedures for SGR here at CSU that support the general procedures outlined, above. For internal SGR staff, step-by-step Quali procedures can be found in the Secure and Global Research Quali Module Guide.

Contracts and Agreements

Data Use Agreements

Users:

- Researcher, Faculty or Staff
- Office of Sponsored Programs

Steps:

- Campus customer presents the draft Data Use Agreement to SGR for review. Preferred submission is via email to: VPR_Export_Control@mail.colostate.edu.
 - Only agreements that include at least one of the following characteristics require SGR review:
 - including a foreign entity or activity
 - including publication or nationality restrictions (these restrictions eliminate the applicability of the Fundamental Research Exclusion)
- SGR reviews the agreement for any export control requirements [reference the [General Export Review Flowchart](#)]:
 - identifying any export controlled equipment, technology or related data to be shared
 - identifying specific data security or proprietary information requirements,
 - screening all the parties against federally binding lists
- SGR will provide a determination to the requestor via email outlining the outcome and any additional steps that need to be taken. [reference [General Determination Form](#)]

Procurement Contracts

Users:

- Procurement and Contracting
- Researcher, Faculty or Staff

Steps:

- Campus customer presents the procurement contract to SGR for review. Preferred submission is via email to: VPR_Export_Control@mail.colostate.edu.
 - Only contracts that include at least one of the following characteristics require SGR review:
 - international vendor
 - military service or equipment
- SGR reviews the contract for any export control requirements [reference the [General Export Review Flowchart](#)]:
 - identifying any export controlled equipment, technology or services to be purchased
 - screening all the parties against federally binding lists
 - if this is service related, identify the service and intended customers
 - determining whether a service will be taking place internationally
- SGR will provide a determination to the requestor via email outlining the outcome (including classification information, if applicable) and any additional steps that need to be taken. [reference [General Determination Form](#)]

- Note: If the ECCN or ITAR classification are determined as part of this process, this should be documented in the Quali purchase order. If a capital asset document will be created, purchaser should work with SGR and Capital Asset Management to document the classification appropriately. See Equipment Review

Non-Disclosure Agreements

Users:

- Office of Sponsored Programs
- Researcher, Faculty or Staff

Steps:

- Campus customer presents the Non-Disclosure Agreement (NDA) to SGR for review. Preferred submission is via email to: VPR_Export_Control@mail.colostate.edu.
 - Only agreements that include at least one of the following characteristics require SGR review:
 - include an international partner
- SGR reviews the agreement for any export control requirements [reference the [General Export Review Flowchart](#)]:
 - identifying any export controlled equipment, technology or services to be shared
 - identifying any nationality restrictions based on export classifications
 - screening all the parties against federally binding lists,
 - identifying specific data security or proprietary information requirements, if applicable.
- SGR will provide a determination to the requestor via email outlining the outcome and any additional steps that need to be taken with signing the NDA. [reference General Determination Form]
 - Note: If the ECCN or ITAR classification are determined as part of this process, SGR will document it in the Quali Export Module.
 - Note: If any specific IT security language is included, this will be sent to [Academic Computing and Networking Services](#) for review.

Memorandum of Understanding (MOU)

Users:

- Office of Sponsored Programs
- Researcher, Faculty or Staff

Steps:

- Campus customer presents the Memorandum of Understanding (MOU) to SGR for review. Preferred submission is via email to: VPR_Export_Control@mail.colostate.edu.
 - Only MOUs that include at least one of the following characteristics require SGR review:
 - include an international partner
- SGR reviews the MOU for any export control requirements [reference the [General Export Review Flowchart](#)]:
 - identifying any export controlled equipment, technology or services to be shared

- identifying any nationality restrictions based on export classifications
- screening all the parties against federally binding lists,
- identifying specific data security or proprietary information requirements, if applicable.
- SGR will provide a determination to the requestor via email outlining the outcome and any additional steps that need to be taken with signing the MOU. [reference [General Determination Form](#)]
 - Note: If the ECCN or ITAR classification are determined as part of this process, SGR will document the determination in the Quali Export Module.
 - Note: If any specific IT security language is included, this will be sent to [Academic Computing and Networking Services](#) for review.

Master Research and Development Agreement (MRDA)

Users:

- Researcher, Faculty or Staff
- Office of Sponsored Programs

Steps:

- Campus customer presents the Master Research and Development Agreement (MRDA) to SGR for review. Preferred submission is via email to: [VPR Export Control@mail.colostate.edu](mailto:VPR_Export_Control@mail.colostate.edu).
 - Only agreements that include the following characteristic require SGR review:
 - include an international partner
- SGR reviews the MRDA for any export control requirements [reference the [General Export Review Flowchart](#)]:
 - identifying any export controlled equipment, technology or services to be shared
 - identifying any nationality restrictions based on export classifications
 - screening all the parties against federally binding lists,
 - identifying specific data security or proprietary information requirements, if applicable.
- SGR will provide a determination to the requestor via email outlining the outcome and any additional steps that need to be taken with signing the MRDA. [reference [General Determination Form](#)]
 - Note: If the ECCN or ITAR classification are determined as part of this process, SGR will document the determination in the Quali Export Module.
 - Note: If any specific IT security language is included, this will be sent to [Academic Computing and Networking Services](#) for review.

Material Transfer Agreement (MTA)

Users:

- Researcher, Faculty or Staff
- Office of Sponsored Programs

Steps:

- Campus customer presents the Material Transfer Agreement (MTA) to SGR for review. Preferred submission is via email to: VPR_Export_Control@mail.colostate.edu.
 - Only MTAs that include at least one of the following characteristics require SGR review:
 - include an international partner
 - include an export-controlled material/item
- SGR reviews the MTA for any export control requirements [reference the [General Export Review Flowchart](#)]:
 - identifying any export controlled equipment, technology or services to be shared
 - identifying any nationality restrictions based on export classifications
 - screening all the parties against federally binding lists,
 - identifying specific data security or proprietary information requirements, if applicable.
- SGR will provide a determination to the requestor via email outlining the outcome and any additional steps that need to be taken with signing the MTA. [reference [General Determination Form](#)]
 - Note: If the ECCN or ITAR classification are determined as part of this process, SGR will document the determination in the Kuali Export Module.
 - Note: If any specific IT security language is included, this will be sent to [Academic Computing and Networking Services](#) for review.
 - Note: This documentation will be maintained with OSP, as well as SGR.

Equipment Review

Users:

- Procurement and Contracting
- Researcher, Faculty or Staff
- Property Management

Steps:

- Campus customer presents the equipment to SGR for review. Preferred submission is via email to: VPR_Export_Control@mail.colostate.edu.
 - Only equipment that includes at least one of the following characteristics require SGR review:
 - utilize an international vendor
 - will be used internationally
 - include a known export-controlled material/item
 - serve a potentially military purpose
 - listed in the budget of an export-controlled research project
- SGR reviews the specifications for any export control requirements [reference the [General Export Review Flowchart](#)]:
 - identifying any export controls of the equipment or technology
 - determining whether or not the equipment is housed or will be shipped within the US or internationally
 - identifying the associated capital asset record in KFS, and associating the export review

- establishing a Technology Control Plan, if applicable. [see [Technology Control Plan Addendum - Equipment Specific](#)]
- SGR will provide a determination to the requestor via email outlining the outcome and any additional steps that need to be taken. [reference [General Determination Form](#)]
 - Note: Once the ECCN or ITAR classification are determined, it should be documented in the Kualu Purchase Order and Capital Asset Management documents to record the classification appropriately.
 - Note: Export Control tags are available to identify restricted equipment.

Education & Training

In-Person Training

Users:

- Deans, Research Associate Deans, and Department Chairs
- Researcher, Faculty or Staff
- Office of Sponsored Programs
- General Counsel
- Procurement and Contracting
- Central Receiving and Mail Services
- International Programs
- Human Resources
- Research Services
- Risk Management and Insurance

Steps:

- Campus customer requests or SGR offers an in-person training. Training can be requested through the [online portal](#) or via email to: VPR_Export_Control@mail.colostate.edu. SGR prepares a tailored training outlining general export compliance topics as well as topics relevant to the audience.
- General training will cover:
 - basics of export controls
 - how export controls work in an academic environment
 - federal agencies with purview
 - licenses and exemptions
 - CSU processes and contacts
- SGR will give the presentation requestor(s).
- Training will be documented by SGR in Kualu Research.
 - Note: In-person trainings do not fulfill a specific federal requirement, and are meant to be informational. If the requestor requires a documented, recognized training for some purpose, consider using the [CITI Training Module](#).

Lab or Department Training

Users:

- Deans, Research Associate Deans, and Department Chairs

- Researcher, Faculty or Staff

Steps:

- Campus customer requests or SGR offers a department-wide or lab-wide training. Trainings can be requested through the [online portal](#) or via email to: VPR_Export_Control@mail.colostate.edu. SGR prepares a tailored training outlining general export compliance topics as well as topics relevant to the audience.
- General training will cover:
 - basics of export controls
 - how export controls work in an academic environment
 - federal agencies with purview
 - licenses and exemptions
 - CSU processes and contacts
- Based on the size and needs of your lab, training can be offered online or in-person. A presentation will either be given to the lab by SGR or offered through the BRIDGE Learning Management System.
- Training will be documented by SGR in Quali Research.

Technology Control Plan Training

Users:

- Deans, Research Associate Deans, and Department Chairs
- Researcher, Faculty or Staff
- Office of Sponsored Programs

Steps:

- Upon drafting of a Technology Control Plan, SGR will offer all TCP personnel in-person training. Additional trainings can be requested through the [online portal](#) or via email to: VPR_Export_Control@mail.colostate.edu. SGR prepares a tailored training outlining general export compliance topics as well as responsibilities upon signing the TCP.
- General training will cover:
 - identifying all export controlled equipment or technology included on the TCP
 - outlining the required security and restrictions
 - providing contact information and resources in case needed
- In conjunction with training, personnel will be asked to sign the Technology Control Plan.
- SGR will document training in Quali Research for each individual attendee including date and individual presentation given.
 - Note: If the TCP includes NIST IT requirements, [Academic Computing and Networking Services](#) or an authorized representative will provide a Data Security Briefing, as well. This will be determined on a case-by-case basis.

CITI Program Training

Users:

- Deans, Research Associate Deans, and Department Chairs

- Researcher, Faculty or Staff
- Office of Sponsored Programs
- General Counsel
- Procurement and Contracting
- Central Receiving and Mail Services
- International Programs
- Human Resources
- Research Services
- Risk Management and Insurance

Steps:

- Campus customer seeks out individual, online training through CSU's subscription to CITI Program (citiprogram.org) training portal.
- Campus customer must create a CITI Program account and affiliate it with Colorado State University to have access to the free training modules. Contact SGR if you have trouble registering.
 - Training completion certificates will be recognized at other universities, if needed.
 - Training will be available for verification through the CITI Program portal for both the trainee and SGR staff.

International Shipping / Transfers

Users:

- Researcher, Faculty or Staff
- Central Receiving and Mail Services

Steps:

- Campus customer submits their international shipping information via the [International Shipping Checklist](#).
 - For a timely review, include sufficient detail in the checklist. This is especially important when dealing with biological material. Reference the relevant guidance before filling out the checklist:
 - [International Shipping Checklist](#)
 - [Shipping Export Restricted Biologicals](#)
 - [Informational - Published Works and Public Domain / Publicly Available](#)
 - International shipments that do not require US Customs forms by [Mailing Standards of the USPS, International Mail Manual](#) will similarly not require a CSU International Shipping Checklist. The following requirements for Priority Mail International and DO NOT require the customer to submit a checklist:
 - flat rate envelopes
 - under 16 ounces
 - under ¾ inch thick
 - documents only (cannot contain digital media)
- Current as of June 2019**
The customer is responsible to verify with CSU Shipping and Receiving and/or the current regulations before determining this exemption. If unsure, the customer should submit a checklist.

- Customers who have procured a SGR blanked authorization for common shipments may reference their blanket authorization shipment number for all relevant shipments for up to 1 year. To establish a blanket authorization for multiple identical shipments, contact Shipping and Receiving: csushipping@colostate.edu or SGR: VPR_Export_Control@mail.colostate.edu
- Upon checklist submission, Kuali will automatic screen the recipient and destination. The shipper and SGR will receive an automated email with the results of the screen. If the email does not note any restrictions, it will come back GREEN. This is a notification to the shipper and Central Receiving to move forward.
 - Note: If the description of the shipment item is incomplete, it will be held for more information before shipping, even if the screening came back GREEN.
 - Note: If the recipient's information is incomplete, it will be held for further review.
- If the automatic screening finds a potential concern it will come back RED. These shipments require a review by SGR staff. SGR reviews each flagged checklist for any export control requirements [reference the [General Export Review Flowchart](#)]:
 - identifying any export controlled equipment, technology or biologicals to be shared
 - identifying any nationality restrictions based on export classifications
 - screening all the parties against federally binding lists.
- Once SGR determines that the flagged entries are not a concern, they will clear the shipment and send this determination to the shipper and Central Receiving in an email resolution. This is a notification to the shipper and Central Receiving to move forward.
 - Note: If SGR cannot clear the flagged shipment, they will reach out to the shipper for more information. These will be handled on a case-by-case basis.

Biologicals - If you are shipping Biologicals, please include the scientific name of the biological in your checklist to avoid any delays. This is especially important with goods that are packaged with temperature controls, etc. [Reference [Shipping Export Restricted Biologicals](#)]

Informational - Published Works and Public Domain / Publicly Available

Published works and information in the public domain are not subject to US export controls as described in both ITAR and EAR regulations. Therefore, the restrictions to certain countries and recipients will not apply. If you are sending an item that fulfills any of the definitions below, please include the definition in your checklist shipment description.

Published – ...Unclassified technology or software is “published,” and is thus not “technology” or “software” subject to the EAR, when it has been made available to the public without restrictions upon its further dissemination...

Check out the full federal regulation here: [15 CFR 734.7](#)

Public Domain - Public domain means information which is published, and which is generally accessible or available to the public...

Check out the full federal regulation here: [22 CFR 120.11](#)

Publicly Available – Information and “software” that are “published” [see above], arise from fundamental research, are released by instruction in a catalog course, appear in patents, are non-proprietary system descriptions, or are telemetry data. (Summarized)

Check out the full federal regulation here: [15 CFR 734.3\(b\)\(3\)](#)

International Travel

International Travel

Users:

- Deans, Research Associate Deans, and Department Chairs
- Researcher, Faculty or Staff
- Office of Sponsored Programs
- General Counsel
- Procurement and Contracting
- Central Receiving and Mail Services
- International Programs
- Human Resources
- Research Services
- Risk Management and Insurance

Steps:

- Campus customer requests their travel via Kuali Financial Systems using a Travel Authorization document. Travel from departments with more than minimal risk for export controls or to more highly restricted destinations will automatically route to SGR as an FYI.
- Based on the traveler and destination, SGR will reach out with travel advice via email or set up an in-person meeting to discuss any possible restrictions or considerations for their international travel. [Reference [International Travel Advice](#)]
- General considerations include:
 - general safety and information security (personal, research data, technology, etc.)
 - possible licensing requirements (most commonly for travel to Cuba and Iran)
 - resources and contact information
- Communication will be documented by SGR in Kuali Research for each individual receiving travel advice.
 - Note: SGR will only contact individuals with general travel advice once per 2 years, unless there are unique considerations for an upcoming trip.

Informational – Embargoed and Sanctioned Countries

The [Office of Foreign Assets Control](#) administers a number of different sanctions programs. The sanctions can be either comprehensive or selective, using the blocking of assets and trade restrictions to accomplish foreign policy and national security goals. Similarly, the [Bureau of Industry and Security](#) implements sanctions against certain countries pursuant to the Export Administration Regulations.

The list of OFAC sanctioned countries is updated periodically and is available [here](#).

Information about BIS embargoes and special controls within the EAR is available [here](#).

Comprehensively sanctioned or embargoed locations are higher risk travel destinations regarding possible licensing requirements.

License

License requirements will be determined on a case-by-case basis. Not all restricted technology and/or equipment will require licensing. Depending on the circumstances, research topic, etc., licensing may be required from one of a collection of federal agencies with export compliance oversight. SGR will verify the need for a license with the researcher, shipper, or CSU staff member before beginning this process. Licensing review will most likely be triggered by the creation of a Technology Control Plan, shipping request, international travel authorization, visa review, or procurement action.

If you have questions about licensing that are not triggered by another process, please reach out to SGR as soon as possible via email: VPR_Export_Control@mail.colostate.edu. Licensing actions can take months to process, so the earlier we begin the process, the better.

Per CSU Policy, VPR is the only entity at CSU authorized to submit export licenses on behalf of the university. The three most common agencies involved in export licensing related to CSU activities are detailed, here.

Department of State

International Traffic in Arms Regulations (ITAR) are enforced by the Department of State under 22 CFR §§ 120-130. These cover defense related articles and information used for military purposes such as: explosives, chemicals delivery systems, and biological agents.

Department of Commerce

Export Administration Regulations (EAR) enforced by the Department of Commerce under 15 CFR §§ 730-774. These cover consumer items else such as grain, office equipment, automobiles, software and computers.

Department of Treasury

Office of Foreign Assets Control (OFAC) Regulations enforced by the Department of the Treasury under 31 CFR §§ 501-598. These cover economic sanctions and general embargoes, and limit any exports to certain countries.

License

Steps:

- Most importantly, make sure SGR has verified that an export license will be required for the specific situation.
 - Note: If a general license or license exemption is applicable, SGR will work with the campus customer to document that internally.
- SGR requests required information from the campus customer. Once compiled, campus customer present requested information via email to: VPR_Export_Control@mail.colostate.edu.
- SGR prepares all required paperwork for the license submission.
 - For ITAR licenses, this will include a signed certification from CSU's Empowered Official, as explained in CSU Policy: Export Control.
- Requirements for licenses will vary based on the reasons for control, type of export, classification of equipment/technology, and more. For a general overview of what will most likely be required, reference the [Deemed Export License Guideline](#).

- Upon submission, SGR will contact the customer with the license application number and any additional, available information.
 - SGR will serve as the liaison between the federal agency and the customer to answer questions and/or provide additional information, if necessary.
- Upon receipt of a license or denial, SGR will communicate with the campus customer and provide all the documentation.
- SGR will document all relevant information in Quali Research. The campus customer should also retain documentation, as well as provide copies to impacted parties (eg. Sponsored Programs, Procurement, etc.)
 - Note: Once the ECCN or ITAR classification are determined as part of this process, SGR will document this in Quali, where appropriate. This may affect a capital asset, an award document, a TCP, etc.

Commodity Jurisdiction or Commodity Classification Automated Tracking System Request Steps:

- Work with SGR to determine if an export classification can be determined internally. If this is not possible, SGR can move forward to request an official classification for the equipment or technology. This process is very similar to entering a license request and can take weeks or months to process.
 - Commodity Jurisdictions (CJ) are official requests to determine purview and classification of items/technology under the ITAR
 - Commodity Classification Automated Tracking System Requests (CCATS) are official requests to determine purview and classification of items/technology under the EAR
- SGR requests required information from the campus customer. Once compiled, campus customer present requested information via email to: VPR_Export_Control@mail.colostate.edu.
- SGR prepares all required paperwork for the CJ or CCATS.
- Requirements may vary based on the equipment/technology.
- Upon submission, SGR will contact the customer with the CCATS application number and any additional, available information.
 - SGR will serve as the liaison between the federal agency and the customer to answer questions and/or provide additional information, if necessary.
- Upon notification from the federal agency, SGR will communicate with the campus customer and provide all the documentation of the outcome. This will generally include:
 - whether or not the item/technology is under EAR/ITAR purview
 - the EAR/ITAR classification
- SGR will document all relevant information in Quali Research. The campus customer should also retain documentation.
- Upon receipt, SGR and campus customer will discuss the next steps based on the outcome of the CJ or CCATS.
 - This may include implementing or updating a Technology Control Plan, requesting a federal license, etc.
 - Note: Receiving a determination on a CJ or CCATS is not equivalent to receiving a license. It is strictly a determination of purview and classification.

- Note: Once the ECCN or ITAR classification are determined as part of this process, SGR should documented this in Quali, where appropriate. This may affect a capital asset, an award document, a TCP, etc.

Exemptions or Exceptions

Steps:

- Most importantly, make sure SGR has verified that an export license will be required for the specific situation.
- SGR requests required information from the campus customer. Once compiled, campus customer present requested information via email to: VPR_Export_Control@mail.colostate.edu.
 - Requirements for review will vary based on the reasons for control, type of export, classification of equipment/technology, and more.
- Before applying for a federal license, SGR will review to verify whether a general license or license exemption is applicable. Each situation will be unique, and require an individual regulation review.
 - Exemptions refer to the ITAR
 - Exceptions refer to the EAR (List-Based or Transaction Based)
- SGR will document all relevant information in Quali Research. The campus customer should also retain documentation, as well as provide copies to affected parties (eg. Sponsored Programs, Procurement, etc.)
 - Note: Once the ECCN or ITAR classification are determined as part of this process, SGR should documented this in Quali, where appropriate. This may affect a capital asset, an award document, a TCP, etc.

Other

Other federal agencies require unique export compliance documentation and licensing, including:

- Agriculture Department
- Centers for Disease Control and Prevention
- Department of Energy
- Drug Enforcement Agency
- Environmental Protection Agency
- Fish and Wildlife Service
- Food and Drug Administration
- Maritime Administration
- Nuclear Regulatory Commission
- Patent and Trademark Office
- U.S. Census Bureau
- U.S. Customs and Border Protection

Export control requirements for these agencies appear infrequently in CSU business, and will be handled on a case-by-case basis. If you think this applies to you, reach out to SGR directly via email to: VPR_Export_Control@mail.colostate.edu.

Informational - Fundamental Research Exclusion

The Fundamental Research Exclusion (FRE) removes fundamental research [as defined below] and resulting information from the purview of export controls. Institutions of higher education rely on this exclusion heavily to limit the scope of export control regulations on campus. It is important to note that certain actions will remove our eligibility to use the FRE for a specific circumstance. Some of these include:

- accepting publication or dissemination restrictions
- accepting nationality restrictions
- performing research outside of the United States
- sharing access to controlled equipment, instead of just technology

Informational – Fundamental Research

ITAR Definition [22 CFR 120.11\(8\)](#):

Fundamental research is defined to mean basic and applied research in science and engineering where the resulting information is ordinarily published and shared broadly within the scientific community, as distinguished from research the results of which are restricted for proprietary reasons or specific U.S. Government access and dissemination controls. University research will not be considered fundamental research if:

- (i) The University or its researchers accept other restrictions on publication of scientific and technical information resulting from the project or activity, or
- (ii) The research is funded by the U.S. Government and specific access and dissemination controls protecting information resulting from the research are applicable.

EAR Definition [15 CFR 734.8\(c\)](#):

Fundamental research means research in science, engineering, or mathematics, the results of which ordinarily are published and shared broadly within the research community, and for which the researchers have not accepted restrictions for proprietary or national security reasons.

Informational - No License Required Determinations

Once an item or technology has been reviewed for export compliance reasons, there are a few common outcomes where licensing is not required:

- The item/technology is controlled by the the Department of State International Traffic in Arms Regulations (ITAR) or the Bureau of Industry and Security Export Administration Regulations (EAR) to some level.
 - SGR will then review this item/technology in relation to how it is being used, shared, transported, developed, etc. Often, even though the item/technology is controlled, it will not require a license.
- The item/technology is controlled at the lowest level by the Bureau of Industry and Security (BIS) Export Administration Regulations (EAR). This classification is EAR99.

- SGR will then review this item/technology to determine whether there are any restricted end users, it will be transported directly to (or re-routed to) an Informational – Embargoed and Sanctioned Countries, or it will be used for a restricted end use. EAR99 items will almost never require any further licensing.

Note: EAR99 includes items as common as pencils, and has an extremely broad scope.

- The item/technology is not subject to export controls at any level.
 - This will not require any further documentation or oversight from SGR.

Note: This is commonly due to exemptions such as the Informational - Fundamental Research Exclusion or the Informational - Published Works and Public Domain / Publicly Available designation.

Restricted Party Screening

Procurement International Vendor Reviews

Users:

- Researcher, Faculty or Staff
- Procurement and Contracting

Steps:

- Campus customer submits their International Vendor Review information via email: VPR_Export_Control@mail.colostate.edu. This request should include:
 - Vendor Name and KFS Vendor#
 - PO Document Number
- SGR reviews the vendor and contract for any export control requirements [reference the [General Export Review Flowchart](#)]:
 - identifying any export controlled equipment, technology or services to be purchased
 - screening all the parties against federally binding lists
 - if this is service related, identify the service and intended customers
 - determining whether or not a service will be taking place internationally
- SGR will provide a determination to the requestor via email outlining the outcome and any additional steps that need to be taken before moving forward with the purchase order. [reference [General Determination Form](#)]
 - Note: If an ECCN or ITAR classification are determined as part of this process, this should be documented in the Kuali purchase order. If a capital asset document will be created, purchaser should work with SGR and Capital Asset Management to document the classification appropriately. See [Equipment Review](#)

International Partners Reviews

Users:

- Deans, Research Associate Deans, and Department Chairs
- Researcher, Faculty or Staff

- Office of Sponsored Programs
- General Counsel
- International Programs

Steps:

- Campus customer submits their International Partner Review information via email: VPR_Export_Control@mail.colostate.edu. This request should include:
 - international partner name and location/address
 - brief description of the anticipated collaboration
 - any associated draft contracts or agreements
- SGR reviews the individual/institution and contract for any export control requirements [reference the [General Export Review Flowchart](#)]:
 - identifying any export controlled equipment, technology or services to be purchased
 - screening all the parties against federally binding lists
 - if this is service related, identify the service and intended customers
 - determining whether or not a service will be taking place internationally
- SGR will provide a determination to the requestor via email outlining the outcome and any additional steps that need to be taken before moving forward with the collaboration. [reference [General Determination Form](#)]
 - Note: If an ECCN or ITAR classification are determined as part of this process, this should be documented in Kual, where appropriate.
 - Note: Research that takes place internationally does not qualify for the Fundamental Research Exclusion (FRE). Working internationally can change the licensing requirements previously determined for on-campus research. See [Informational - Fundamental Research Exclusion](#)

Human Resources and Admissions Reviews

Users:

- Human Resources
- Admissions

Steps:

- Campus customer submits their potential new hire or new student information into Visual Compliance and screen.
 - Not all new hires or students are screened through Visual Compliance. The subset of incoming applicants are identified based on specific criteria set by HR or Admissions' policies and procedures.
- Screens that come back with no matches require no further action. The screening documentation and reasoning will be maintained in Visual Compliance by SGR.
- Screens that come back with matches that the user can verify are false matches can be cleared in the Visual Compliance dashboard, and documented with basic reasoning.

- Example: The date of birth for the applicant and the match are not the same.
- Screens that come back with possible matches that the user is not comfortable clearing themselves can be escalated to SGR for review.
 - Reference the Visual Compliance RPS Adjudication/Escalation Guide document for more details on how to process screenings within the system.
- SGR reviews the individual matches to verify whether there are any concerns.
- SGR will provide a determination to the requestor via email outlining the outcome and any additional steps that need to be taken before moving forward with the hire/admittance. [reference [General Determination Form](#)]
 - Note: Any reviews that are complicated and need additional information outside of the Visual Compliance reasoning text box should be entered as a Kuali Research project by SGR.

Informational – Visual Compliance

Through export control regulations, the United States government restrict or prohibit U.S. individuals and companies from exporting or providing services of any kind to any party contained in U.S. government export denial, debarment, and blocked persons lists. CSU uses Visual Compliance as a third-party service to provide a consolidated screening tool for our SGR staff and other campus users.

Most campus users do not require access directly to this program, as restricted party screening (RPS) is already included in the majority of SGR processes. If you or your unit would like to discuss gaining access to this resource, contact SGR directly [as outlined below]

VPR_Export_Control@mail.colostate.edu

Visual Compliance Access and Training

Steps: Campus customer submits requests access to Visual Compliance directly to SGR. SGR provides the applicant with a Visual Compliance Attestation Form.

- Applicant reads, signs and returns their Visual Compliance Attestation Form to vpr_export_control@mail.colostate.edu
- SGR will create the user account and send the account instructions and basic overview/guide via email.
- SGR will offer optional in-person training, as well.
- Access tracking and user training will be documented in Kuali Research.

Sponsored Project

Proposal Development Review

Users:

- Researcher, Faculty or Staff
- Office of Sponsored Programs

Steps:

- Campus customer submits their Proposal Development document via Kuali Research. The document submission includes questions to assess possible export compliance concerns. Any proposals that trigger export compliance will automatically be forwarded to SGR.

- Note – This will not slow down your proposal submission. SGR is included as an FYI, only, and will review your project to prepare for any future requirements.
- SGR reviews the proposal for any export control requirements [reference the [General Export Review Flowchart](#) and [Proposal and Award Checklist](#)]:
 - identifying any export controlled equipment, technology or services to be purchased
 - identifying any export controlled research topic or development of technology
 - screening all the parties against federally binding lists
 - if this is service related, identify the service and intended customers
 - determining whether or not research will be taking place internationally
- If SGR determines that the researcher will need to comply with export compliance requirements upon award, they will reach out to the PI and/or Sponsored Programs with more information. Often, this stage is just a touch base. Generally, no action will need to be taken until determination of an award.
 - SGR will document review in Quali Research to reference in case of award.
 - Note: If an ECCN or ITAR classification are determined as part of this process, this should be documented in Quali, where appropriate.

Awarded Project Review

Users:

- Researcher, Faculty or Staff
- Office of Sponsored Programs

Steps:

- Office of Sponsored Programs (OSP) is notified that a proposal has been funded and will review the resulting agreement or contract for common export compliance red flags and contact SGR via email: VPR_Export_Control@mail.colostate.edu.
- SGR reviews the proposal, contract and checklist for export control requirements [Reference [Proposal and Award Checklist](#)]:
 - identifying any export controlled equipment, technology or services to be purchased
 - identifying any export controlled research topic or development of technology
 - screening all the parties against federally binding lists
 - if this is service related, identify the service and intended customers
 - determining whether or not research will be taking place internationally
 - contract clauses and resulting requirements (specifically, publication restrictions, nationality restrictions, export-specific restrictions, and IT security requirements)
- Once SGR determines which export compliance requirements will apply to the project, they will reach out to the PI and the Research Administrator with more information. Often, this stage will require the development of a Technology Control Plan, license request, or exemption determination.
 - Note: If an ECCN or ITAR classification are determined as part of this process, this should be documented in Quali, where appropriate.
 - Note: Research that takes place internationally does not qualify for the Fundamental Research Exclusion (FRE). Working internationally can change the licensing requirements previously determined for on-campus research. See [Informational - Fundamental Research Exclusion](#)

- Upon completion of required compliance actions (eg. implementing TCP, receiving license, etc.) SGR will inform both PI and OSP as well as providing the appropriate documentation. OSP should maintain copies of TCPs and licenses with the project file.
- SGR will maintain all documentation in Kualu Research to fulfill recordkeeping requirements.

Technology Control Plans

Users:

- Researcher, Faculty or Staff
- Office of Sponsored Programs

Lab Technology Control Plans

Steps:

- When a TCP has been identified as a requirement (at award, receiving equipment, through individual contact on non-funded work) SGR will compile appropriate information and begin working with PI to complete a Technology Control Plan (TCP).
- Each plan will be unique, and will require different types of information. However, the TCP format will remain mostly the same. For an idea of what kind of information will be required, reference [TCP Template](#) and [Guidance](#) documents. Also, found in the [Appendix](#).
 - Best practice is to implement a lab-TCP that covers the basic security and makeup of a PI's lab. This will serve as an umbrella, basic TCP to hold each individual project. Reference the TCP Guidance for more detail.
- When drafting the TCP, researchers and SGR will determine the appropriate approval period. Most plans will be valid for 2 years before a required renewal. Periodic reviews will be responsibility of both SGR and the PI to complete. Reference
- If, at any point, there are significant changes to the plan the PI should contact SGR to revise the plan. Common reasons for changes include:
 - change in personnel
 - moving controlled equipment to a different location/lab
 - change in project scope
 - change in award/contract language requirements (eg. adding CUI requirements)
- Once the document has been completed, SGR will offer TCP training to all listed personnel.
- SGR will maintain all documentation related to negotiations, creation and training related to TCPs. The PI should also maintain a copy of their TCP to ensure compliance with the plan.

Technology Control Plan Addendum - Project Specific

TCPs that relate to a specific sponsored project will be added to the main lab TCP as part of the process described above. Reference [TCP Template](#) and [Guidance](#) documents. [also available in the [Appendix](#)]

Technology Control Plan Addendum - Equipment Specific

TCPs specifically for equipment will be created as an addendum to the main lab TCP as part of the process described above. Reference [TCP Template](#) and [Guidance](#) documents. [also available in the [Appendix](#)] Once identified, controlled equipment items will be tracked in Kualu through the Capital

Asset Management function. This is important to ensure that any restrictions are clearly addressed when:

- providing visual access to international students or visitors (ITAR only)
- sharing development or technical know-how with international students or visitors
- shipping equipment internationally
- sending equipment to CSU surplus or otherwise selling equipment

Technology Control Plan Addendum - CUI Specific

Controlled Unclassified Information handling outside of federal systems requires certain information security measures to be in place. These requirements are above general information security policies at CSU. Each project with this requirement will require additional consideration for data storage, transport, etc.

TCPs put in place specifically to comply with Controlled Unclassified Information (CUI) requirements will be created by [Academic Computing and Networking Services](#) (ACNS). If this requirement applies to you, connect with ACNS to identify applicability as well as information security options at CSU. ACNS will be your primary contact for TCP development.

Common contract clauses that invoke CUI requirements include, but are not limited to:

DFARS 252.204-7012 – Safeguarding of Unclassified Controlled Technical Information

FAR 52.204-21 – Basic Safeguarding of Covered Contractor Information Systems

NIST 800-171 – Protecting Controlled Unclassified Information in Nonfederal Systems and Organizations

As more federal agencies adopt CUI requirements, new clauses may come into effect. Office of Sponsored Programs will contact SGR and ACNS with relevant restriction information during contract negotiations.

Visas

Users:

- Deans, Research Associate Deans, and Department Chairs
- Researcher, Faculty or Staff
- International Programs

Steps:

- International programs or department presents the Export Compliance Questionnaire section of the I-129 or DS-2019 visa request to SGR for review. Preferred submission is via email to: VPR_Export_Control@mail.colostate.edu.
 - Visas of the following types require SGR review:
 - H-1B temporary work visas or O-1 non-immigrant visas
 - J-1 scholar exchange visas (not student visas)
- SGR reviews the application for any export control requirements related to the following factors [reference the [General Export Review Flowchart](#)]:

- restrictions on the research topic
- potentially restricted research in the supervisor/PI's lab
- relative risk level for the department in regard to export controls
- restricted party screening of the international scholar and previous international institution
- cross referencing international scholar's country with possible export restrictions
- SGR will provide a determination to the requestor via email outlining the outcome and any additional steps that need to be taken. [reference [General Determination Form](#)]
 - Note: Most commonly, CSU-sponsored Visa applicants do not require any further action. In some cases, though, CSU will need to submit a license application on behalf of the incoming scholar or researcher to participate in restricted research here at CSU. In this situation, SGR will contact International Programs and the PI or department to discuss. These will be handled on a case-by-case basis.

H-1B, and Similar

CSU sponsors incoming employees on H-1B (or similar) visas as a temporary work visa. These generally route through [International Programs](#). See H-1B information, [here](#).

J-1 Scholars

CSU sponsors incoming researcher scholars, professors and exchange visitors on J-1 exchange visitor visas. These generally route through [International Programs](#). See J-1 information, [here](#).

Background: Classified Research and Insider Threat Program

Classified research means work conducted under a specific designation as classified by the Federal funding sponsor or other U.S. government authority.

Colorado State University follows the requirements of the National Industrial Security Program Operating Manual (NISPOM), for both classified research activities and the insider threat program. The Office of the Vice President for Research maintains an Insider Threat Program Plan for Colorado State University.

Procedures: Classified Research and Insider Threat Programs

Research Proposals and Awards

Users:

- Researcher, Faculty or Staff
- Office of Sponsored Programs

Steps:

- Campus customer submits their Proposal Development document via Quali Research. The document submission includes questions to identify potential classified research. Any proposals that trigger classified research compliance will automatically be forwarded to SGR.

- Note: This will not slow down your proposal submission. SGR is included as an FYI, only, and will review your project to prepare for future requirements.
- SGR reviews the proposal for classified research requirements:
 - verifying that access to classified material is required
 - verifying required personnel clearances
 - verifying required classified computing requirements
 - verifying required classified material holding
 - identifying any unique requirements
- If SGR determines that the researcher will, in fact, require access to classified material or spaces, they will reach out to the PI and/or Sponsored Programs with more information.
 - The PI is responsible to verify that all requirements detailed in Faculty and Administrative Professional Manual D.7.15.2 ([here](#)) are fulfilled
- The researcher will be required to complete a [Classified Research Engagement Request Form](#) and return it to SGR. [also available in the [Appendix](#)]
 - SGR will document review along with the completed request form in Quali Research to reference in case of award.
- In most cases, SGR and the PI will schedule an in-person meeting to discuss the logistics of coordinating the project.
 - Note: Sponsored Programs should submit the completed DD254 to SGR, as soon as it is available.

Classified Research Engagement Request

The CSU Faculty and Administrative Professional Manual includes requirements on CSU's policy for classified research on campus. In order to allow classified research on campus, researchers must fulfill (for each project) the requirements detailed in [D.7.15.2.\(1-5\)](#). The fifth requirement mandates an approval from the department head, college dean, and the appropriate vice president.

To fulfill this requirement, SGR has established the [Classified Research Engagement Request Form](#). This must be completed prior to beginning any classified research at CSU.

Personnel Clearances

CSU maintains personnel clearances for CSU-affiliated faculty and staff that require them. These procedures are outlined and maintained by the National Industrial Security Program Operating Manual (NISPOM).

Classified Facility Visits

When CSU-affiliated cleared personnel require access to another classified facility, SGR will provide an access authorization through the current federal electronic system. If you are a cleared CSU employee and require authorization, please contact us directly:

vpr_secure_and_global_research_solutions@mail.colostate.edu

Background: Restricted Facility Access Management

Common Access Cards (CAC) Request Coordination

CSU supports employees who require access to U.S. military installations in performance of their duties. If you need a new Common Access Card (CAC) or a renewal for an expiring card, please

follow this link: <https://www.cemml.colostate.edu/wp-content/uploads/2018/05/CAC-Request-Form-and-Guidance.pdf>

A list of frequently asked questions can be found at this link: <https://www.cemml.colostate.edu/frequently-asked-questions-for-cacs/>, and any CSU student or employees can contact the CAC coordinator at: cemml_cac@colostate.edu.

Visitor Access Requests / Building Access Letters

When a CSU employee requires physical access to either the Pentagon or National Guard Bureau, SGR can provide a Visitor Access Request (VAR) letter to the institution on the employee's behalf. Please email cemml_cac@colostate.edu in order to initiate a VAR.

SGR General Administrative

Below is a list of general administrative duties for which SGR staff are responsible. For questions, please contact SGR directly: vpr_secure_and_global_research_solutions@mail.colostate.edu

Basic Inquiries

Basic inquiries are handled on a case-by-case basis. If a full analysis is conducted, SGR staff will document in Kuali Research, as appropriate.

Financials

SGR maintains an annual budget overseen by the Office of the Vice President for Research. Some of the main annual financial responsibilities include:

- renewing registration with the Directorate of Defense Trade Controls
- renewing registration with Visual Compliance
- renewing registration with CITI Program

Travel

SGR supports travel for their staff to maintain professional development initiatives, strengthen collaborations with other university colleagues, and to advocate for CSU faculty and staff. This includes memberships and travel to annual conferences.

Kuali Module Maintenance

SGR supports CSU Research Services in an effort to maintain and further develop the Kuali Export Control module in Kuali Research. SGR staff regularly collaborate with Research Services to improve module function, data organization, metrics and reporting.

Metrics and Workflow Analysis

SGR works to compile and analyze workflow data to streamline processes within our office.

Suspicious Contact Routing

National Industrial Security Operating Manual (NISPOM) 1-302b instructs Facility Security Officers (FSOs) to report suspicious activities to DSS. SGR complies with this requirement, as well as maintaining relationships with other local federal agency representatives to share information, if needed.

Appointment Letters

SGR maintains a number of appointment letters related to industrial security needs. These are maintained internally, and are not handled by CSU Human Resources. These appointment letters identify different security roles within our facility, and serve as certifications as well as to grant access to numerous federal systems.

Empowered Officials

Empowered Officials at the university are required to sign off on federal license requests submitted on behalf of CSU. These appointment letters are maintained by SGR and provided to federal agencies, as needed. For more information, see [CSU Policy 7-2001-009](#)

SGR Staff Secure Facility Roles

SGR security staff are required to have appointment letters in place that are signed by key management personnel, outlining their role in industrial security at CSU. These appointment letters are maintained by SGR and provided to federal agencies, as needed.

SGR Annual Planning

Education & Training

SGR maintains an annual education and training plan as part of the annual Risk Assessment. Some of the main areas of annual training include:

- Insider Threat Training (for cleared personnel and Insider Threat Working Group)
- Annual Security Briefing Refresher Training (for cleared personnel)
- Department export compliance training (on a rotating basis)
- Campus-wide available training (Professional Development Institute)

Risk Assessment

SGR updates the internal Risk Assessment annually to reassess new and ongoing risks regarding export compliance, industrial security and secure access. This process helps provide regular updates to the Office of the Vice President for Research, as well as grow and improve these compliance programs.

Policy Review and Updates

CSU Policies for Export Control and Classified Research updated in response to changes in requirements or programs. The most current versions are maintained by the CSU Policy Library, and can be found here:

[CSU POLICY: EXPORT CONTROL](#)

[CSU POLICY: CLASSIFIED RESEARCH](#)

Budget Process

SGR participates in the budgeting process each year with the Office of the Vice President for Research to account for spending, salary and changing needs.

Professional Development Planning

SGR plans professional development for their staff on an annual basis in response to staff members' needs and professional strengths. Each planning year will vary slightly to directly address the current staff.

Student Employee Development Planning

SGR values the work and support received from student employees. Student employees are included in professional development plans for the year, and are encouraged to participate in trainings and events. Each plan will vary based on student employees' skills and goals within the unit.

Cross-reference by User Group

Users	Sections
<i>Deans, Research Associate Deans, and Department Chairs</i>	CITI Program Training In-Person Training International Partners Reviews Lab or Department Training Technology Control Plan Training Visas
<i>Researcher, Faculty or Staff</i>	Awarded Project Review CITI Program Training Data Use Agreements Equipment Review In-Person Training International Partners Reviews International Shipping / Transfers International Travel Lab or Department Training Master Research and Development Agreement (MRDA) Material Transfer Agreement (MTA) Memorandum of Understanding (MOU) Non-Disclosure Agreements Procurement Contracts Procurement International Vendor Reviews Proposal Development Review Technology Control Plan Addendum - CUI Specific Technology Control Plan Addendum - Equipment Specific Technology Control Plan Training Technology Control Plans Visas

<i>Office of Sponsored Programs</i>	Awarded Project Review CITI Program Training Data Use Agreements In-Person Training International Partners Reviews Master Research and Development Agreement (MRDA) Material Transfer Agreement (MTA) Memorandum of Understanding (MOU) Non-Disclosure Agreements Proposal Development Review Technology Control Plan Addendum - CUI Specific Technology Control Plan Addendum - Equipment Specific Technology Control Plan Training Technology Control Plans
<i>General Counsel</i>	CITI Program Training In-Person Training International Partners Reviews
<i>Procurement and Contracting</i>	Equipment Review In-Person Training Procurement Contracts Procurement International Vendor Reviews
<i>Central Receiving and Mail Services</i>	CITI Program Training In-Person Training International Shipping / Transfers
<i>International Programs</i>	CITI Program Training In-Person Training International Partners Reviews Visas
<i>Human Resources</i>	CITI Program Training Human Resources and Admissions Reviews In-Person Training
<i>Property Management</i>	Equipment Review In-Person Training
<i>Admissions</i>	CITI Program Training Human Resources and Admissions Reviews In-Person Training
<i>Research Services</i>	CITI Program Training In-Person Training
<i>Risk Management and Insurance</i>	CITI Program Training In-Person Training
<i>General – Informational</i>	Background: Export Control Informational – Embargoed and Sanctioned Countries Informational – Fundamental Research Informational - Fundamental Research Exclusion Informational - No License Required Determinations Informational - Published Works and Public Domain / Publicly Available Informational – Visual Compliance

Appendix

Definitions / Forms / Guidance

Click on the title to access the document.

[Proposal and Award Checklist](#)

[TCP Template](#)

[TCP Guidelines](#)

[International Travel Advice](#)

[International Shipping Checklist](#)

[Export Restricted Biological Items](#)

[Deemed Export License Guideline](#)

[Visual Compliance Attestation Form](#)

[Visual Compliance RPS Adjudication/Escalation Guide](#)

[Export Controlled or Embargoed Countries](#)

[US Export Control Laws FAQs](#)

[Classified Research Engagement Request Form](#)

SGR Process Guides

Click on the title to access the document.

[General Export Review Flowchart](#)

[General Determination Form](#)