**Wright State University Technology Control Plan Briefing for Export-Controlled Technology and Information**

Prior to the acceptance or initiation of any sponsored research project that involves the use, receipt or development of export-controlled technology, technical data or other restricted information or materials, Wright State University’s Research Compliance Office requires that the faculty or staff member that acts as the principal investigator for the research develop a plan for the safe and lawful management of the project’s controlled elements prior to acceptance of the award and commencement of the research. The University policy on Export Compliance No. XXXX can be found at http://

The research project identified below may involve the receipt, use and/or development of technical data that is controlled under United States export control laws: the Export Administration Act and Export Administration Regulations (“EAR”), enforced by the Bureau of Industry and Security in the Department of Commerce, or the Arms Export Control Act and its implementing regulations, the International Traffic in Arms Regulations (“ITAR”), enforced by the Directorate of Defense Trade Controls in the State Department. Links to information about the ITAR and EAR may be found at Wright State’s Export Controls website at <http://www.wright.edu/rsp/Security/export_controls.htm>

Since this project has been identified as having export control restrictions, technical information, data, materials, software, hardware, and any other controlled items or elements must be secured from use, access, and possible observation by unlicensed foreign nationals. Security measures will be appropriate to the classification involved and will be disclosed through the completion of the Technology Control Plan (TCP) documentation and certification of that plan. It is the responsibility of the Principal Investigator (PI) to develop a written TCP which must be approved and signed by the University’s Export Control Officer (ECO).

The Principal Investigator must ensure each eligible person working on the project has read and understands the information presented in this briefing and the TCP, and that no ineligible persons have access. All project personnel must complete training as determined by the ECO. In addition, the ECO may meet with project personnel regarding the handling of Export‐Controlled Technology/Information and the Technology Control Plan. Project personnel must sign the TCP Certification before they can begin work on the project. The signed TCP and TCP Certification should be returned to Matt Grushon in the Office of Research Compliance at 208 University Hall. Copies of the signed TCP and TCP Certification will be sent to the PI and the assigned Pre-Award adminstrator in the Research & Sponsored Programs’ office.

**TECHNOLOGY CONTROL PLAN**

In accordance with export control regulations as specified in EAR and ITAR and University Policy No. XXXX, a Technology Control Plan is required for this project in order to prevent unauthorized export of controlled technology or information deemed to be sensitive to national security or economic interests. This form contains the basic and minimum elements of the TCP.

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| Date: |  | Title of Sponsored Project/Activity: |  |
| RSP Proposal #:  | Banner/Grant #:  |
| Sponsor:  | Prime:  |
| Project Period:  |  |
| Responsible Individual/Principal Investigator: |  | Department & Address: |  |
| Phone: |  | E-mail: |  |
| Technical description of item/technology/equipment/software to be controlled: |  |

1. **Physical Security Plan:** *(Project data and/or materials must be physically protected from observation or access by unauthorized individuals by performing project activities in secured research locations, or during secure time blocks when observation by unauthorized persons is prevented and other information and technology security measures are implemented to ensure unauthorized access.)*
	1. **Location:** *(describe the physical location of EACH sensitive technology/item using building and room numbers. A schematic of the immediate location is highly recommended to be attached as an Appendix to this plan.)*
	2. **Physical Security:** *(provide a detailed description of your physical security plan designed to protect your item/technology from unauthorized access, i.e., secure doors, limited access, security badges, etc.)*
	3. **Perimeter Security Provisions:** *(describe perimeter security features of the location of the protected technology/item)*
2. **Information Security Plan:** *(Appropriate measures should be taken to secure controlled electronic information, including User ID’s, password control, SSL or other approved encryption technology. Database access must be managed via a Virtual Private Network (VPN), allowing only authorized persons to access and transmit data over the internet, using 128-bit SSL or other advanced, federally approved encryption technology.)*
	1. **Structure of IT security:** *(describe the information technology (IT) setup/system at each technology/item location)*
	2. **IT Security Plan:** *(describe in detail your security plan, i.e., password access, firewall protection plans, encryption, etc.)*
	3. **Verification of Technology/Item Authorization:** *(describe how you are going to manage security on export controlled technology in case of termination of employees, individuals working on new projects, etc.)*
	4. **Conversation Security:** *(describe your plan for protecting information about controlled technology in conversations. Discussions about the project or work product are limited to the identified contributing investigators and are held only in areas where unauthorized personnel are not present. Discussions with third party subcontractors are only to be conducted under signed agreements that fully respect the non-U.S. citizen limitations for such disclosures.)*
3. **Item Security**
	1. **Item Storage:** *(describe your plan for protecting the physical technology and/or by-product. Both soft- and hard- copy data, notebooks, reports and research materials must be stored in locked cabinets; preferably in rooms with key-controlled or badge-controlled access. Equipment or internal components and associated operating manuals and schematic diagrams containing “export controlled” technology are to be physically secured from unauthorized access as well.)*
	2. **Item Disposal:** *(describe your plan for disposal of physical items and electronic data/information after an appropriate record retention period.)*
4. **Project Personnel**
	1. Clearly identify every person (including their national citizenship) who is determined to have authorized access to the controlled technology: *(the Export Compliance Officer will assist with the review of documents needed to demonstrate citizenship status. You must inform the Office of Research Compliance as project personnel change over the course of the project.)*

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| **Full Name** | **Department** | **Role (student, postdoc, etc)** | **Country of Citizenship** |
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1. **Personnel Screening Procedures:**
	1. Controlled technology cannot be shared with any person or entity found on any of the US Government denied party lists. The ECO will screen all project personnel listed above through Visual Compliance and report any negative results to the PI. Please describe any other screening procedures (i.e., criminal, driver’s license, etc.) to be undertaken by the PI:
2. **Training/Awareness Program**
	1. All project personnel must have completed the appropriate CITI Export Compliance modules before beginning work on this project. Enrollment information for the course can be found at: www.citiprogram.org.
	2. Describe how you will inform U.S. employees and/or foreign nationals about restrictions and security measures for this project regarding the controlled technology:
		* Review and signature of TCP and export certification
3. **Publication and Dissemination**
	1. Any graduate student fulfilling their thesis research requirement with results from projects that are export controlled must be a US Person, as must their thesis advisory committee members and any persons participating in the thesis defense. Please identify any thesis student or committee member associated with this project:
	2. Publication of the thesis and any research results must be pre-approved by the sponsor and might be impacted by the requirements of the research contract. Please contact the ECO and the sponsor to discuss any planned publications associated with the research results of this project.
4. **International Travel**
	1. Identify any known locations and dates for international travel associated with this project: *(It is your responsibility to notify the Office of Research Compliance as early as possible about international travel to best facilitate any license applications, travel briefings, and safety accommodations that may be necessary.)*
5. **Self Evaluation Program**
	1. Self Evaluation Schedule: (describe how often you plan to review/evaluate your TCP. Plans must be re-evaluated annually.)
		* Annually
	2. Action Item and Corrective Procedures: (describe your process to address findings in your self evaluation audits)
		* Review faulty findings and implement corrective measures immediately
6. **Acknowledgements:**

I understand my responsibilities as a PI on this export controlled project. I have read this TCP and discusses it with the Export Compliance Officer. I understand the plan and agree to comply with all its requirements. I agree to participate in regular audits and enhancements to this TCP. I will ensure that project personnel are briefed of their responsibilities under this TCP, have completed training, and signed the TCP certification before being granted access to the controlled information, material or equipment. During the period of performance, if any question arises as to this TCP, I will seek clarification from the Export Compliance Officer.

**Principal Investigator: Department Head:**

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| Printed Name |  | Printed Name |
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| **Office of Research Compliance:** |  | **TCP Review:** |
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|  |  |  |  |  |
| Signature | Date |  | Signature | Date |
| Matthew Grushon |  |  |
| Printed Name |  | Printed Name |

**TECHNOLOGY CONTROL PLAN CERTIFICATION**

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| Principal Investigator/ Responsible Party: |       |
| Department: |       |
| Sponsor Name: |       |
| Project Title: |       |

This is to acknowledge I have read and understand the “Briefing on the Handling of Export-Controlled Information”, and that I agree to comply with the requirements of the Technology Control Plan (TCP).

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Acknowledgement of Immediate Supervisor:

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| Signature | Date |
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| Printed Name/Role |

*Signed TCP Certification must be returned to Matt Grushon, Director,*

*Office of Research Compliance, 378 University Hall, 3640 Colonel Glenn Highway, Dayton, Ohio 45435-0001.*

TCP Program Reviewed and Certification Received:

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| --- | --- |
| Signature | Date |
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| Printed Name/Role |