

	Office of Export Controls and Customs	SOP Number:	SPR001.0
	Standard Operating Procedure for:	Implementation Date:	AUG-07-2018
	Sponsored Research Collaborations	Last Revision Date:	AUG-07-2018
		Related Policy Number:	REG01.15.08
		Related Policy Name	Export Controls and Customs Compliance

## PURPOSE

Describe the process for Sponsored Research Collaborations.

This Standard Operating Procedure (SOP) establishes the responsibilities of faculty and staff engaged in sponsored research and programs that involve export and/or import requirements. Research that involves foreign nationals, foreign entities, international travel or shipping may implicate export and/or import requirements. An export license from the appropriate U.S. government agency may be required for certain research programs, including fundamental research programs, to be conducted at ECU or in other countries. Licenses may be required when foreign nationals work in, or have access to, ECU's campus laboratories, or when research results are to be shared with persons or institutions in other countries. Additionally, the physical movement of items or materials across international borders may require that ECU declare information to relevant U.S. government agencies.

## SCOPE

### RELEVANT ACTIVITIES

### RELEVANT AUDIENCE

Export and import screening for sponsored research programs that include any one or more of the following: <ul style="list-style-type: none"> <li>➤ Foreign travel</li> <li>➤ Foreign national or foreign entity involvement</li> <li>➤ International shipping or receiving of items or materials</li> </ul>	Faculty, Staff, Students
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## RESPONSIBILITIES

TASK	RESPONSIBLE PARTY	WHEN
Notify OECC of all research proposals that have an export control flag	Research Administration	Monthly
Perform screening and analysis on research proposals to determine export and import implications	OECC	Within 14 calendar days of notification from Research Administration
Review OECC's summary and acknowledge export / import requirements	Lead PI	Within 3 business days of receiving summary from OECC

TASK	RESPONSIBLE PARTY	WHEN
Initiate export license application	OECC	After coordination with Lead PI
Prepare Technology Control Plan	Lead PI	With guidance from OECC
Approve Technology Control Plan	OECC	After review with Lead PI
Notify OECC when research proposal changes	Lead PI	As soon as change is known

## DEFINITIONS/ACRONYMS

ACRONYMN or TERM	DEFINITION
Export Control	Regulates the shipment or transfer, by whatever means, of certain items, technology, software, and services out of the United States.
Export License	A specific authorization provided by a government agency authorizing the export or activity that is subject to certain regulations or sanctions.
Foreign Entity	A company or institution not incorporated in the U.S.
Foreign National	A person who is not a U.S. citizen or legal permanent resident alien
Lead PI	Lead Principal Investigator of a research program
License Exception	A general authorization that allows for exports that may otherwise require a specific license to take place without obtaining a license if certain stated conditions are met and upheld.
OECC	Office of Export Controls & Customs. Responsible for maintaining compliance with import and export regulations for the ECU community.
Research Administration	ECU office responsible for sponsored research.
Restricted Party	An individual or entity included on any government sanctions list, such as the Entity List, Denied Persons List, or Specially Designated Nationals List, among others. Inclusion on a sanctions list may restrict or prohibit engaging with the named individual or entity.

## PROCEDURES

Sequence	RESPONSIBLE PARTY	DESCRIPTION
1	Research Administration	Research Administration provides monthly report to OECC with summary details of all newly created proposals that include an incidence of export control.

Sequence	RESPONSIBLE PARTY	DESCRIPTION
2	OECC	OECC completes export and import compliance screening to determine all export control and/or import requirements related to the intended research and provides summary of conclusions to Lead PI. Screening includes foreign national review, restricted party screening for any international entities involved, export license determination, potential shipping requirements, etc.
3	Lead PI	Lead PI reviews screening results provided by OECC and asks any questions regarding said results. Once review is complete, Lead PI is required to acknowledge results by signing and returning OECC summary form.
4	OECC	<i>Conditional Step</i> - If an export or import license is required for the proposed research, OECC will initiate the license process with the Lead PI.
5	OECC	<i>Conditional Step</i> - If a Technology Control Plan (TCP) is required for the proposed research, OECC will initiate the TCP process with the Lead PI.
6	Lead PI	<i>Conditional Step</i> - If details of the proposed research change, the Lead PI is required to notify OECC to review the changes and determine if the changes create any new export or import implications.

## OECC SERVICE LEVEL TARGET

SERVICE PERFORMED	TRIGGER EVENT	TARGET Turn-Around-Time
Perform screening and analysis on all research proposals to determine any export and import implications that may arise during the course of a research program.	Research proposal created where an export control flag has been created based on details of the intended program.	Within 14 calendar days of notification from Research Administration

## REFERENCES

REFERENCE DESCRIPTION	LOCATION
ECU Export Control Policy	<a href="http://www.ecu.edu/prr/01/15/08">http://www.ecu.edu/prr/01/15/08</a>

# CREATION/REVISION/APPROVAL HISTORY

<b>Create Date</b>	<b>Owner</b>	<b>Approver</b>	<b>Comments</b>
Aug-07-2018	Daniel Gregory	Tony Rowe	First Release

<b>Revision Date</b>	<b>Owner</b>	<b>Approver</b>	<b>Significant Revisions</b>
Not Applicable	Not Applicable	Not Applicable	Not Applicable

END OF PROCEDURE