Tarleton State University
Technology Control Plan (TCP)

Statement of Commitment

Tarleton State University is committed to export control compliance. It is the policy of Tarleton State University to comply with United States export control laws and regulations. All employees and students must be aware of and are responsible for the export control implications of their work and must ensure that their activities conform to export control laws and regulations. Individuals and the university may be subject to severe penalties for violations of export control laws and regulations, including the loss of research funding, loss of export privileges, as well as criminal and civil penalties.

This project/activity/equipment involves or has the potential to involve the receipt and/or use of Export Controlled Items, Technology, or Information. As a result, the project/activity comes under the purview of either the State Department's International Traffic in Arms Regulations (ITAR)(22 CFR Parts 120 – 130) or the Department of Commerce's Export Administration Regulations (EAR) (15 CFR §§734.8 and 734.9) and/or other export control regulations.

Export-controlled technical information, data, items, software, hardware, biological, and chemicals must be secured from use and/or observation by unauthorized foreign nationals.

In accordance with U.S. export control laws and regulations, a Technology Control Plan (TCP) is required to prevent unauthorized access and/or use of export controlled items, information, technology or software. This document serves as a basic template for the minimum elements of a TCP and the safeguard mechanisms to protect against unauthorized access or use. Security measures and safeguards shall be appropriate to the export classification. Contact the Tarleton State University Export Controls office at (254) 968-9415 or exportcontrol@tarleton.edu for assistance to complete this form.

Establishing a TCP is a multi-step process. The first step is the assessment and approval phase where the principal investigator/responsible individual ("PI") develops a TCP in coordination with Tarleton's Export Control office and seeks approval of the plan from the PI's department/unit head, and Tarleton's Office of Research Compliance and Biosafety. When all approvals have been secured the PI shall review the TCP with all users, and each user will execute a copy of the briefing and certification form at the end of the TCP outlining individual responsibilities for handling export controlled technology, information and/or items. When all users, including the PI, have executed the TCP briefing and certification, the PI submits all signed documents to the Compliance and Strategic Initiatives, and retains copies for their files, and implements the TCP. It is the PI's responsibility to notify the Export Control office of any anticipated changes to the TCP (e.g., personnel, scope of work, safeguards, etc.). All records relating to

this TCP will be retained for at least five years from the date this TCP is no longer necessary to protect these items, technology and/or information. Records will be maintained in accordance with the Tarleton State University record retention policy and 15 C.F.R., Part 762 (EAR); 22 C.F.R. §§122.5, 123.22, and 123.26 (ITAR); and 31 C.F.R. §501.601 (OFAC).

Title of Project or Activity: (describe project, activity or equipment subject to TCP)

Identification of sponsor and relevant project number:

Description of Export Controlled Item, Technology, Information or Software and reason for control:

Principal Investigator/Responsible Individual and title:

Phone: **email:**

Identified Export Control Classification Number / ECCN: (e.g. 5D002) or ITAR Category: (e.g. VII (e)). If you do not have the ECCN or ITAR Category, contact your sponsor or program manager for this vital information. This form cannot be processed without the applicable ECCN or the ITAR Category.
ITAR Category II (a) - Guns and Armament over 12.7 mm

Export Control Compliance
exportcontrol@tarleton.edu
University Compliance
Box# T-0835
(254) 968-9415

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Briefing Requirement

The Principal Investigator/Responsible individual is required to brief his or her staff on the requirements of this TCP.

1. **Personnel** (clearly identify every person, including their country of citizenship, who may have authorized access to the controlled information, technology or item. Attach additional sheets if necessary.

    Name & Citizenship:

    Name & Citizenship:

    Name & Citizenship:

    Name & Citizenship:

    Name & Citizenship:

    Any change in personnel will require an amendment of this plan as described below in section 5. On departure of any of the personnel described above, appropriate measures must be implemented to secure the subject matter of the TCP, including collecting all keys and updating access controls.

2. **Personnel Screening Procedures:** All persons who may have access to export-controlled items, information and/or technology must be listed on the TCP and undergo Restricted Party Screening using export control screening software. **Screening Results will be maintained as part of this TCP.**

3. **Physical Security Plan:** (Data and/or items, technology must be physically shielded in secured lab spaces to prevent observation or possession by unauthorized individuals or during secure time blocks when observation by unauthorized persons is prevented. This would pertain to laboratory management of "work-in-progress")

    Location (include building and room numbers, lab name, etc.):

Physical Security (provide a description of your physical security plan designed to protect the item/technology from unauthorized access or unauthorized removal of technical information, data, items, software, hardware, biological and chemicals (e.g. secure doors, limited access, security badges, locked desks or cabinets, secure computers, marking all physical items etc.):

Item Storage (Both soft and hard copy data, notebooks, reports and research materials are stored in locked cabinets; preferably in rooms with key-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):

Servicing of item (provide a description of how this item will be serviced or repaired during its lifetime and how custodial and related services will be addressed, including disposal and destruction):

Janitorial Service (provide a description of how this item will be secured during custodial servicing periods.):

Destruction or Return of Materials (describe how the export controlled materials will be handled at the end of the project or when they are no longer needed, e.g., shredding, file wipes, hard drive destruction, return to sponsor, etc.):

4. **Information Security Plan** (Appropriate measures must be taken to secure controlled electronic information, including User ID's, password control, SSL etc.)

   Describe what information security safeguards will be used:

5. **Amendments:** Any changes to the approved plan, including personnel changes and location changes, must be approved in writing.

6. **Training / Awareness Program**

All participants listed on a TCP must complete export control online basic training, sign the Certification for Safeguarding Export Controlled Technology, Information or Items, and be briefed by the PI / Responsible Individual as to the restrictions of this TCP. Additional training is recommended for all individuals listed, please contact the Tarleton State Export Control office at (254) 968-9415 or exportcontrol@tarleton.edu with questions about training.

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Required Training: TrainTraq Course Number: 2111212- Export Controls & Embargo Training - Basic Course.

7. By signing this TCP, I certify that I have read and understand all clauses found in this TCP. I certify that all information found in this TCP is accurate and complete to the best of my knowledge.

Principal Investigator / Responsible Individual

Signature: Title:

Printed Name: Date:

8. Reviewed by:

Signature: Title:

Printed Name: Date: