

Office of Sponsored Programs  
Procedure 10016, Export Controls and Sanctions, Research Security, and  
Industrial Security Compliance Management

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## 1. Introduction

### Responsible Officials:

Associate Vice President for Research and Innovation, Sponsored Programs  
Director, Office of Export and Secure Research Compliance (OESRC)

**Effective Date:** *February 7, 2024*

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## 2. Scope

This procedure outlines the requirements necessary to comply with applicable export controls and sanctions, research security, and industrial security laws, statutes, regulations, Executive Orders, and U.S. Government-wide policies governing research activities subject to [University Policy 13045](#).

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## 3. Procedure Statement

The Office of Sponsored Programs (OSP) functions as the steward of Virginia Tech’s research portfolio and is responsible for ensuring that all research proposals and projects comply with university, federal, and sponsor regulations, policies, and procedures. The purpose of this procedure is to clarify the involvement of OSP in any activity that results in research activities that are subject to review by OESRC for export controls and sanctions, research security, and industrial security compliance management in accordance with [University Policy 13045](#).

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## 4. Definitions

**Commodity Jurisdiction and Classification (CJC)** – OESRC determination concerning the export controls and sanctions, research security, and industrial security that apply to a funded or unfunded award or agreement, as defined in OSP Procedure 10000 Defined Terms in Office of Sponsored Programs, and subject to OESRC review as required by this Procedure.

**Controlled Unclassified Information (CUI)** - Unclassified information designated by the U.S. Government executive branch that requires safeguarding or dissemination controls, pursuant to

and consistent with applicable U.S. laws, statutes, regulations, Executive Orders, and U.S. Government-wide policies.

**Technology Control Plan (TCP)** – A research security plan that is prepared by the Principal Investigator (“PI”) and OESRC, and approved by the Department Head/Chair, to ensure compliance with [University Policy 13045](#).

**Classified Research** – Research subject to Executive Order 13526, 32 CFR 117 (National Industrial Security Program Operating Manual), Intelligence Community Directives, and/or agency specific requirements for safeguarding and handling national security classified information. These agreements typically have a DD Form 254 Contract Security Classification Specification as an attachment or appendix.

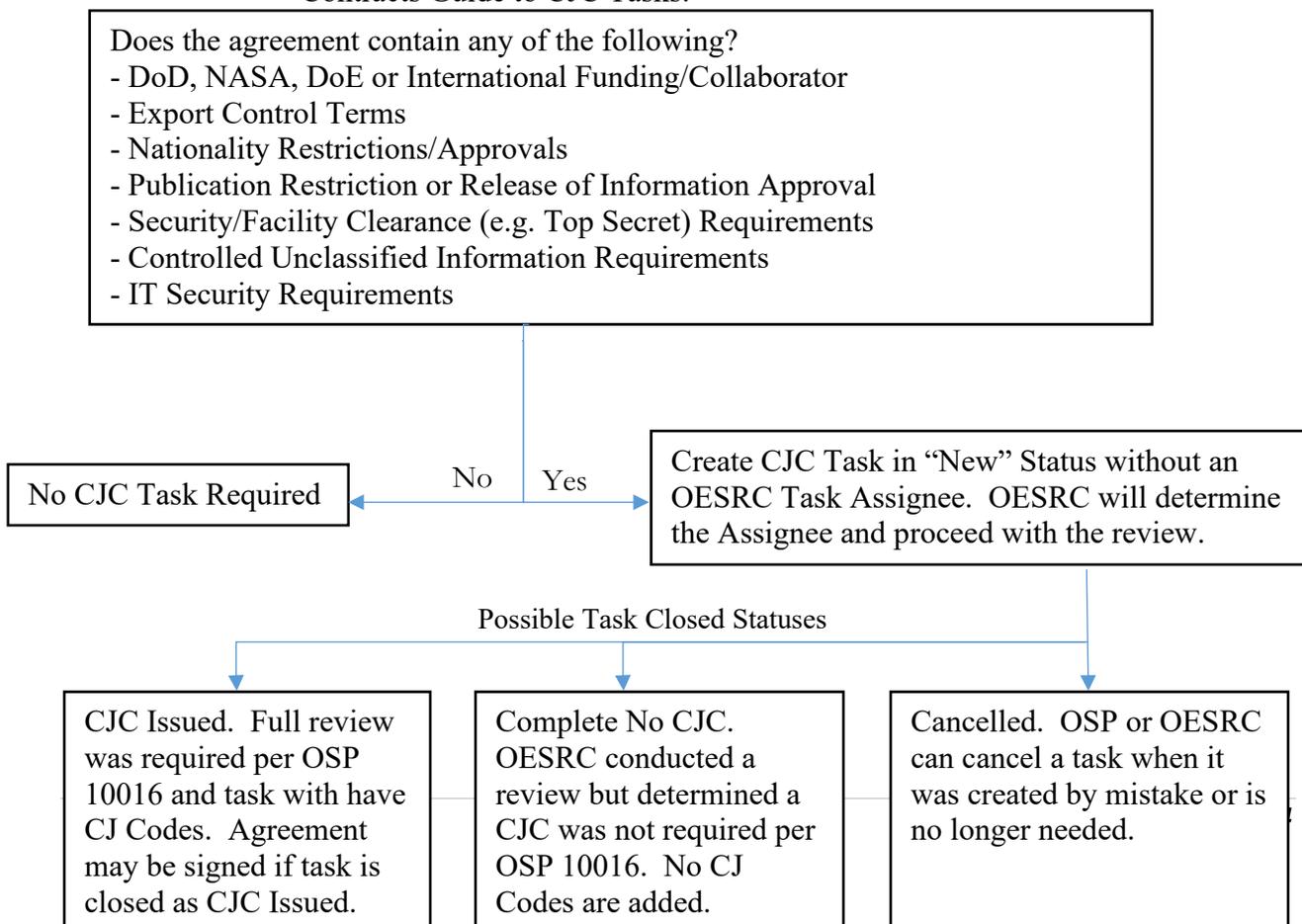
## 5. Compliance Requirements

### The Office of Sponsored Programs Pre-Award:

1. Identify any proposal or solicitation which involves an international collaboration or references to Classified Research and notify OESRC.
2. If any proposal related documents have restrictive markings indicating a form of Controlled Unclassified Information (“CUI”), follow the Operational Guidelines for Controlled Unclassified Information (CUI).

### The Office of Sponsored Programs Contracts:

Contracts Guide to CJC Tasks:



### Subawards

All international subawards require OESRC review by setting up a CJC review task. All domestic subawards for Agreements containing export control banner coders other than “FRE NLR” requires OESRC review by setting up a CJC review task.

### **The Office of Sponsored Programs Post-Award:**

1. Review any agreement modifications for the criteria identified in the Contracts Guide to CJC Tasks (above) and setup a CJC review task for those meeting the criteria.
2. Notify OESRC for all modifications or close out actions to an award or agreement that has a TCP.
3. When directed by the AVP of Sponsored Programs, freeze any funds identified as a source of a potential violation or noncompliance issue.

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## **6. References**

Assistance to Foreign Atomic Energy Activities Regulations (AFAEAR)	10 CFR §810
Controlled Unclassified Information	32 CFR §2002
<a href="#">CUI Registry</a>	
Controlled Unclassified Information (CUI) Handling Procedures	
<a href="#">Executive Order 13526 Classified National Security Information</a>	
<a href="#">Executive Order 13556 Controlled Unclassified Information</a>	
Export Administration Regulations (EAR)	15 CFR §§730-774
Export and Import of Nuclear Equipment and Material Regulations (EINEMR)	10 CFR §110
Foreign Assets Control Regulations (FACR)	31 CFR §§500-599
International Traffic in Arms Regulations (ITAR)	22 CFR §§120-130
<a href="#">National Industrial Security Program Operating Manual</a>	32 CFR §§117
<a href="#">Virginia Tech Policy 13045</a>	

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## **7. Contacts**

- [Associate Vice President for Research and Innovation, Sponsored Programs](#)
- [Office of Export and Secure Research Compliance](#)

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## **8. Roles and Responsibilities**

**Office of Sponsored Programs** – manages the workflow in accordance with Section 5 of this procedure.

**OESRC Export Controls and Sanctions Compliance Program** –OESRC team that manages and completes the CJC determinations and documentation. This team serves as OSP’s primary point of contact for award and agreement reviews.

**OESRC Research Security Program** - OESRC team that manages the TCP research security plan and CUI Handling Procedures.

**OESRC Industrial Security Program** –OESRC team that manages the security for Classified Research.

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## **9. Dissemination**

This procedure may be posted on a Virginia Tech internet accessible site. No public restrictions are noted.

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## **10. Approval and Revisions**

Initial revision 1/29/2024: Adopted from prior procedure OSP 29-05. Revision approved by Associate Vice President for Research and Innovation, Sponsored Programs and Director, OESRC on January 11, 2024.

Revision 2/7/2024: Added “Subawards” subsection to Section 5. Revision approved by Associate Vice President for Research and Innovation, Sponsored Programs and Director, OESRC on [REDACTED]

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