**Technology Control Plan Assessment (TCPA)**

Contact the Export Controls Office (ECO) if you have any questions 513-558-1128 or Exportco@uc.edu.

Principal Investigator: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Prime Sponsor Name and Country: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Project name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date TCPA sent to Principal Investigator: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

You are receiving this form to update your TCP in accordance with UC policy and procedures. **Please complete this form within 30 days of receiving and return to the ECO.** If you have questions or concerns, or need clarification, please reach out to the Export Controls Office, exportco@uc.edu.

| **Assessment Questions** | **Answer Details (please provide specific details)** |
| --- | --- |
| 1. What is the physical security for the location of the project?
 |  |
| 1. What type of log or audit system is used for tracking access to the controlled research (e.g., card swipe, key, etc.) and is it reviewed for validity on a regular basis?
 |  |
| 1. Are the people that have keys or access cards listed on the TCP and do all users have only the minimum access needed for their job function?
 |  |
| 1. Where is the physical location of the export controlled information and or commodities[[1]](#endnote-1)? i.e., locked cabinet, locked room and address of location.
 |  |
| 1. What is the electronic location of the export controlled information (the data path and server)?
 |  |
| 1. Is the stored data encrypted?
 |  |
| 1. How is data sent electronically (e.g., email, USB drive, remote login to sponsor site, etc.?) and what type of encryption is used?
 |  |
| 1. Based on UC standards, is the device containing restricted data secured and/or destroyed properly?
 |  |
| 1. Is there a firewall enabled?
 |  |
| 1. Have you had any break-ins or theft involving the location of the export-controlled project?
 |  |
| 1. Have you had any non-UC visitors to the lab or location of the export-controlled work? Excluding UC faculty, staff and students.

If yes, please list whom.  |  |
| 1. Is proprietary[[2]](#endnote-2) information involved? If yes, what is the export control classification?
 |  |
| 1. Is an NDA, CDA, PIA, or MTA[[3]](#endnote-3) involved?

 If yes, did you obtain the export classification? |  |
| 1. Does the sponsor or Prime supply any items, equipment or materials?
 |  |
| 1. Will the project generate, fabricate, or modify materials? (e.g., prototypes, samples)
 |  |
| 1. Was restricted[[4]](#endnote-4) information created or used during the project?
 |  |
| 1. In the future, do you anticipate a release of “technology” for the “production” or “development” of the equipment/items[[5]](#endnote-5)?
 |  |
| 1. In the past 12 months, has there been any international travel or shipping?

 If yes, where, when and or what? |  |
| 1. Are the research participants listed on the TCP the same researchers involved in the research? Are there any additional participants?

 Please list who and why it changed. |  |
| 1. Is there a foreign person[[6]](#endnote-6) involved in working on this project who has access to the export-controlled items/information?
 |  |
| 1. Is any activity performed at another location? If yes, please list details of each location.
 |  |
| 1. How have you provided deliverables to the sponsor?
 |  |
| 1. Have you received any requests from the sponsor that are of concern?
 |  |
| 1. Any additional comments or concerns?
 |  |

**Attestation: If the ITAR research has concluded, terminating the TCP, it is still** **my responsibility as Principal Investigator to secure ITAR research data and materials for five years after date of research project completion.**

**PI Signature** **Date**

**Reminder:** Contact Export Controls immediately of any new participants to your project. They must complete Export Control training located in CITI Training. A copy of their completed certificate should be sent to Export Controls. Access to controlled information is not permitted until the training has been completed and the certificate submitted to Export Controls. Thank you.

1. Commodities = items, equipment, materials, information, etc. [↑](#endnote-ref-1)
2. Proprietary – relating to property or ownership [↑](#endnote-ref-2)
3. NDA = nondisclosure agreement; CDA = confidentiality disclosure agreement; PIA = proprietary information agreement; MTA = material transfer agreement [↑](#endnote-ref-3)
4. Restricted refers to whether or not there are export regulations placed on an item or technology [↑](#endnote-ref-4)
5. “Technology” is specific information necessary for the "development," "production," or "use" of a product.

“Production” is all production stages, such as product engineering, manufacture, integration, assembly (including mounting), inspection, testing, and/or quality assurance.

“Development” is related to all stages prior to serial production, such as design, design research, design analyses, design concepts, assembly and test of prototypes, pilot production, process of transforming design data into a product, design data, configuration design, integration design, and/or layouts.

\*\*Please note that the terms "technology", "development", and "production”, are defined in Part 772 of the EAR. [↑](#endnote-ref-5)
6. “Foreign person” is any natural person who is not a US citizen, US permanent resident (green card holder) or “protected individual” as defined by 8 USC 1324b(a)(3). It also means any foreign corporation, business association, partnership, trust, society or any other entity or group that is not incorporated or organized to do business in the United States, as well as international organizations, foreign governments and any agency or subdivision of foreign governments (e.g., diplomatic missions). Or a US person representing a foreign entity. [↑](#endnote-ref-6)