This document defines how the various research compliance functions at CUNY colleges and schools can join together to enhance communications related to export controls (EC) based on how each compliance area interacts with projects that involve EC.

I. General requirements

a. EC regulations, their impact on CUNY research and related CUNY policies, procedures, guidance and forms are available at the CUNY Export Control web site. All CUNY research administrators and researchers are required to become familiar with and remain compliant with the requirements set forth at this web site.

b. Research administration and compliance staff at each CUNY college or school who become aware of any international collaborations or researchers traveling abroad in the course of their respective administration or compliance process must inform the campus Export Control Administrator (ECA). The ECA will then evaluate, on a case by case basis, whether a teleconference or in-person travel briefing is required, ensure any necessary screening has taken place, and whether any additional export control evaluation of the scope of work is required.

c. ECAs facilitate the completion of the Preliminary Evaluation Form by researchers and research program directors at their campus. ECAs contact the CUNY Office of Research for further evaluation if any of the responses on the completed form are in the positive.

d. If it is determined that a project or a laboratory requires a Technology Control Plan (TCP), the ECA will ensure that all relevant stakeholders are aware of the TCP requirements.

II. Function Specific Interactions with Other Compliance Areas

a. Campus Grants Officers

i. Upon becoming aware of a sponsored research or program that involves i) international collaboration; ii) international travel; iii) scope of work that falls within one of the high risk export control areas; iv) publication restrictions; and/or v) citizenship restrictions, the grants officer must notify the ECA, who will then evaluate, on a case by case basis, whether a teleconference or in-person travel briefing is required, ensure any necessary screening has taken place, and whether any additional export control evaluation of the scope of work is required. This should occur as early in the process as possible so as to avoid any unnecessary delays.

ii. For projects that involve subcontracts where CUNY is the lead organization, the lead PI/Researcher, in consultation with the grants officer and the ECA, must verify that the subcontractor is in compliance with any applicable export control requirements.
iii. In instances where CUNY is the subcontractor, the grants officer must advise the CUNY PI/Researcher to follow all internal procedures as if CUNY is the lead.

b. Research Integrity Officers (RIO)

   i. RIOs are responsible for providing and documenting ongoing training in responsible conduct of research (RCR) at CUNY campuses. RIOs should collaborate with the ECAs in providing and documenting training related to export controls to all stakeholders at their respective campus.

   ii. The campus ECA will inform the campus RIO of any export controlled projects that include students and/or post-docs, and the RIO will ensure that the students and/or post-docs understand the related restrictions, and whom to contact with any concerns.

c. College Conflicts Officers (CCO) and Conflicts Committee Administrator

Upon becoming aware of a research or program that involves i) international collaboration; ii) international travel; iii) scope of work that falls within one of the high risk export control areas; iv) publication restrictions; and/or v) citizenship restrictions, the campus CCO or the Conflicts Committee Administrator must notify the campus ECA, who will then evaluate, on a case by case basis, whether a teleconference or in-person travel briefing is required, ensure any necessary screening has taken place, and whether any additional export control evaluation of the scope of work is required. This should occur as early in the process as possible so as to avoid any unnecessary delays.

d. Point Person for Research Agreements

Upon becoming aware of any agreements that involve i) international collaboration; ii) international travel; iii) scope of work that falls within one of the high risk export control areas; iv) publication restrictions; and/or v) citizenship restrictions, the campus point person for research agreements must notify the campus ECA, who will then evaluate, on a case by case basis, whether a teleconference or in-person travel briefing is required, ensure any necessary screening has taken place, and whether any additional export control evaluation of the scope of work is required. This should occur as early in the process as possible so as to avoid any unnecessary delays.

e. Human Research Protection Program (HRPP)

   i. Upon becoming aware of any research involving international collaborations and/or travel, the HRPP staff at each CUNY campus must inform the campus ECA, who will then evaluate, on a case by case basis, whether a teleconference or in-person travel
briefing is required, ensure any necessary screening has taken place, and whether any additional export control evaluation of the scope of work is required.

ii. The ECA will inform the campus HRPP office of any projects involving both human subjects and export controls. The campus ECA and the HRPP will collaborate to ensure compliance with both sets of regulations.

f. Animal Welfare

i. Upon becoming aware of any research involving international collaborations and/or travel, the animal facilities and/or Institutional Animal Care and Use Committee (IACUC) staff at each CUNY campus must inform the campus ECA, who will then evaluate, on a case by case basis, whether a teleconference or in-person travel briefing is required, ensure any necessary screening has taken place, and whether any additional export control evaluation of the scope of work is required.

ii. The ECA will inform the animal facilities and/or IACUC staff of any projects involving both animal subjects and export controls. The campus ECA and the animal facilities/IACUC staff will collaborate to ensure compliance with both sets of regulations.

g. Biosafety

i. Upon becoming aware of any research involving international collaborations and/or travel, the Institutional Biosafety Committee (IBC) staff at each CUNY campus must inform the campus ECA, who will then evaluate, on a case by case basis, whether a teleconference or in-person travel briefing is required, ensure any necessary screening has taken place, and whether any additional export control evaluation of the scope of work is required.

ii. The ECA will inform the IBC staff of any export controlled projects requiring biosafety oversight. The campus ECA and the IBC staff will collaborate to ensure compliance with both sets of regulations.