18. Record Keeping

Export control records must be retained for a minimum of five years. This Section addresses the process for required record retention, as well as where and how records are maintained for five years.

CUNY must comply with regulatory requirements regarding export control-related recordkeeping. These records must be organized so as to be available when requested by U.S. governmental authorities or for internal audit purposes. Records include printed and hard copy documents, as well as electronic records (including e-mail, e-mail attachments and other electronic files). All records will be retained for a minimum period of five (5) years from the date of export or from the date of license expiration, as per the requirements of ITAR Section 123.22 and EAR Section 762.6. In some cases, records will require restricted access where, for example, they contain controlled technical data as part of the transaction. Access restrictions will be outlined in the TCP for the project.

Campus Shipping/Receiving personnel shall be responsible for maintaining shipping and receiving related records. OVCR shall likewise be responsible for maintaining all documentation it generates and/or participates in as part of its export control oversight function, including but not limited to MOUs/MOAs, classification and jurisdiction determinations, license-related documentation, screening records, end user statements, sponsored research evaluations, U.S. government communications, etc. Export Control Administrators are also responsible for maintaining all documentation they generate and/or participate in as part of their export control oversight function.