8. **Technology Control Plans (TCPs)**

This Section addresses the implementation of Technology Control Plans (TCPs), when required, to restrict laboratory access of certain items and data from foreign nationals for whom the item is controlled, and would otherwise require an export license to access.

Under certain circumstances, such as the safeguarding of ITAR instruments or data that CUNY has not self-invented, or the receipt of proprietary information from a sponsor or collaborator that CUNY uses to pursue its fundamental research, it may be necessary to develop and implement a TCP to specifically safeguard and restrict access to these items.

The TCP is a documented set of procedures that generally includes but is not limited to the following areas: responsible parties for implementing the TCP; physical controls (laboratory security); IT controls (data file/computer access security); deemed export license requirements (as potentially applicable to foreign nationals who CUNY believes should have authorized access but for whom the items are otherwise restricted); protocols for sharing and transferring the items with other authorized parties outside the scope of the CUNY laboratory; and any other requirements concerning screening, personnel authorization, labeling of items as controlled and time frame for which the TCP is applicable. In general, the Export Control Administrator is responsible for ensuring that adequate resources are in place at the respective College to implement the TCP.

Note that in cases where a U.S. Government agency wishes to review a TCP as part of a licensing procedure or as part of an audit process, the PI and/or Export Control Administrator in charge of implementing the TCP, shall notify OVCR of such a request so that appropriate oversight is in place.