


<b>Export Controls and Sanctions – Standard Operating Procedures</b>	
<b>Export Controls and Sanctions SOP #001: Recordkeeping Version 1.0 – May 2, 2023</b>	

**PURPOSE**

To outline the processes, procedures, and regulations governing the Export Control Officer (ECO) recordkeeping requirements.

**AUTHORITY**

31 CFR §§ 500-599 Office of Foreign Assets Control, Department of the Treasury  
 22 CFR §§ 120-130 International Traffic in Arms Regulations  
 15 CFR §§ 730-780 Export Administration Regulations  
 CRR 430.020 Export Controls and Sanctions Compliance  
 University of Missouri System Export Compliance Management Program

**SCOPE**

This SOP applies to all activities conducted by the ECO.

**PROCEDURE**

The ECO shall maintain export related records for each export control and sanctions review conducted and other activities to support the export controls and sanctions program outlined below. Records shall be maintained in the following locations:

- The UMKC Export Controls Shared Drive accessible by the ECO; a minimum of one IT administrator; and any additional, appropriate UMKC employees as identified by the ECO.
- Visual Compliance™ for export determination records and for all restricted party screenings, including the audit log for whether those screens resulted in hits or not. The ECO shall leave adequate notes in the Visual Compliance™ audit log to identify why any hits were cleared.

**Reviews**

The ECO shall review a variety of university activities including, but not limited to, contracts and agreements, Conflicts of Interest disclosures, requests for support on international shipments and international travel, H-1B visa reviews, etc. As new reviews are sent to the ECO for review, a folder will be created on the shared drive in the Transactional Work\Reviews folder using the following nomenclature:

KYY-MMDD-## PILastName OtherParty AdditionalUMKC#

The K at the beginning designates the review as one for Kansas City. YY-MMDD is the year, month, and day that the review was initially sent to the ECO. ## is the number of review that day. For example, the first review that day will be 01. The second review received that same day will be 02, etc. The AdditionalUMKC# at the end shall be any PeopleSoft Project Number, Shared Services Contract Number, COI Disclosure Number, or any other number identifying the transaction in another UMKC System.

Example:

If a review is sent to the ECO on May 25, 2023 for Dr. Smith's COI Disclosure # 12345 referencing a relationship with Hamburg University, the folder will be named "K23-0525-01 Smith Hamburg University COI Disclosure 12345". If a second review is received that day for a contract from Shared Services for Dr. Jones's MOU with Trinity College Dublin, the folder will be named "K23-0525-02 Jones Trinity College Dublin Contract# 20231234567".

The UMKC ECO shall also log the review in the Research Security and Compliance Microsoft Lists for tracking and metrics purposes. When a review is completed:

- The shared drive folder will contain the following:
  - Any relevant emails to the transaction
  - Any relevant documents (i.e., contracts, purchase orders, statements of work, end user statements, etc.)
  - At least one document from the ECO outlining which regulations were relevant for their review, their analysis of the review, and their conclusion at the end of the review.
- The status of the review in Microsoft Lists will be changed to "Complete".

### Technology Control Plans (TCPs)

If a TCP is needed, a second folder will be created on the shared drive in the Transactional Work\TCPs folder using the following nomenclature:

YY-###K PILastName OtherParty

TCPs will be numbered beginning with the last two digits of the year, followed by the number of TCP that year. All TCPs for Kansas City will end in "K" for Kansas City. TCP folders will reflect the following:

- Drafts of the TCP and all relevant exhibits
- Citizenship verification records for people authorized on that TCP
- The fully executed TCP and any prior executed versions of the TCP
- All acknowledgement forms signed by authorized project personnel
- Records of all annual reviews conducted on that TCP
- Relevant export licenses or export license exceptions

### Training Records

Training records will be maintained on the shared drive in the EC Program\Communication\Training Records folder. Within the Training Records folder, a spreadsheet called "Training Records" shall be maintained reflecting the Training ID, Training Title, Training Method, Training Location, Training Type, Date, and names of all persons trained.

Each training shall have its own folder in the Training Records folder and shall have the following nomenclature:

YYYYMMDD-## Training Title

YYYYMMDD = the year, month, and day the training was given. The first training completed that day shall be assigned a ## of 01. The YYYYMMDD-## is the Training ID to be used on the spreadsheet. Subsequent trainings that day shall increase in number sequentially.

Each Training folder shall contain the following:

- A copy of the training presentation used that day if it was a virtual or in person training. Copies of training presentations need not be captured for online learning such as through CDSE Stepp or Percipio.
- A list of all persons who attended the training. This may take the form of training sign in sheets for in person trainings, Zoom participant reports for virtual trainings, or certificates of completion for online trainings.

### Export Determinations

When determining the export classification of export-controlled items, the “Product Inventory” in the Export Classification Workflow of Visual Compliance shall be used as the system of record. The Product Inventory is shared by all export compliance professionals across the University of Missouri System as a common recordkeeping platform to avoid duplication of efforts. The Part No. shall be the YY-MMDD-## for that day’s export classification. Additional records may be maintained on the UMKC Export Controls Shared Drive but are not required. Within the Product Inventory of Visual Compliance, not only will the part number, description and U.S. export classification be maintained, but also the manufacturer will be listed, if appropriate. Attachments must be uploaded to each record. The attachment(s) will include:

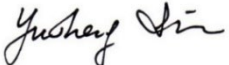
- Documents from the ECO reflecting their thought process and how they reached the conclusion of the appropriate export classification; or
- Documents from the manufacturer of the item or a similar item with their export classification. They may take the form of PDFs of manufacturer websites or PDFs of emails from the manufacturer confirming their export classification.

### Licenses and Exemptions/Exceptions

Within the UMKC Export Controls Shared Drive, in the EC Program folder is a folder called Licenses and Exemptions to track any licenses issued by the Office of Foreign Assets Control (OFAC) and export licenses issued by the Directorate of Defense Trade Controls (DDTC) and/or the Bureau of Industry and Security (BIS) as well as the usage of license exemptions/exceptions authorized through the Foreign Assets Control Regulations (FACR), International Traffic in Arms Regulations (ITAR), or Export Administration Regulations (EAR). One or more spreadsheets will be maintained reflecting licenses or the usage of license exemptions/exceptions. Each license or license exemption/exception will reflect which review and or TCP is using that license or exemption/exception, the date the license or exemption/exception was first authorized for use, and, if applicable, its expiration date.

### Retention Period

Records will be maintained for a minimum of 5 years from the last date of export as is required by the FACR, ITAR, and EAR. If no export is taking place, records of the review shall be maintained for 5 years. After 5 years, the records may be deleted.

Previous Version Dates:	N/A
Signed by:	 May 2, 2023