INTRODUCTION

This Standard Operating Procedure ("SOP") outlines the processes and procedures used by the UMKC assigned Research Security Officer (RSO) to provide export controls and sanctions briefings and trainings and CUI trainings to relevant people at UMKC.

PURPOSE

The University of Missouri-Kansas City engages in export-related activities in a variety of ways and is required to comply with export control and sanctions regulations to maintain its export privileges. Because of the complexity of export control and sanctions regulations, each area of UMKC is affected differently and briefings/trainings must be provided or facilitated by the RSO.

SCOPE

To facilitate compliance with applicable U.S. export controls and sanctions regulations as well as CUI requirements, this SOP establishes responsibilities for the RSO with the objective of ensuring adequate training is provided to appropriate areas of UMKC.

PROCEDURE

The RSO provides outreach and education on export control and sanctions regulations to a variety of areas of the university, ensuring that they understand their obligations to the export controls and sanctions program at UMKC. Additionally, the RSO ensures CUI trainings are completed by relevant people at UMKC.

Responsibilities

The Research Security Officer (RSO) is responsible for:

- Ensuring that administrative areas within UMKC with responsibilities for flagging export controls and sanctions matters to the RSO for review receive training at least an annually.
- Ensuring that all UMKC personnel who have been granted access to export controlled information receive regular briefings or training specific to their handling responsibilities at least once every 3 years. For example, if there are significant changes to a Technology Control Plan (TCP) or significant changes to the regulations, the RSO may need to provide training more frequently.
- Ensuring that UMKC personnel who have been granted access to Controlled Unclassified Information (CUI) complete a CUI training on an annual basis.
- Supporting one-off requests for additional trainings or briefings as requested by UMKC leadership, faculty, staff, and students.

Administrative areas within UMKC are responsible for:

- Completing trainings as requested by the RSO.

- Asking questions and seeking clarification for any portions of the training that are not understood.
- Notifying the RSO if there are any new people in the unit requiring training between annual trainings so that the RSO can facilitate an off-cycle training.

Personnel with access to export controlled information and/or CUI are responsible for:

- Completing briefings and trainings as requested by the RSO.
- Asking questions and seeking clarification for any portions of the briefing or training that are not understood.

Training for administrative areas within UMKC

S1. Prior to the annual training, the RSO partners with the leader of that administrative unit to review the existing SOP. Are there any changes that need to be made to the SOP?

- If yes, review and edit the SOP together, obtaining any institutional signatures that are required. Once that is complete, move to S2.
- If no, move to S2.

S2. The RSO partners with the leader of that administrative unit to schedule a time for the training and prepares a training presentation specific to the SOP in place for that unit.

S3. The RSO meets with the unit to facilitate the training and maintains records of the training in accordance with SOP #001 Recordkeeping.

S4. The RSO creates a reminder for the following year to review the SOP again and repeat this process.

Training for personnel with access to export controlled information

S1. When adding someone to a TCP, the RSO will ensure that an Export Controls TCP briefing is provided to that person per SOP #003 Technology Control Plans.

S2. The RSO maintains records of the training in accordance with SOP #001 Recordkeeping.

S3. The RSO regularly reviews the timing of these trainings when completing TCP Audits to identify if anyone's briefing has gone or is about to go past-due and provides a refresher briefing, as needed.

S4. If training is not completed within 30-days of the initial request, access to export controlled information will be removed.

Training for personnel with access to CUI

S1. The RSO will ensure that all UMKC personnel with access to CUI complete a CUI training and will record that training in accordance with SOP #001 Recordkeeping.

S2. The RSO regularly reviews the timing of these trainings when completing TCP Audits to identify if anyone's training has gone or is about to go past-due and triggers a refresher training, as needed.

S3. If training is not completed within 30-days of the initial request, access to CUI will be removed.

RECORDKEEPING

All export control recordkeeping will be managed by the Research Security Officer in accordance with SOP #001: Recordkeeping.

Previous Version Dates:	N/A	
Signed by:		Anthony Caruso, Ph.D. 06/30/2024 Interim Vice Chancellor for Research