

October 8, 2010

Office of Research Administration

**Export Compliance Review of Research  
Proposals and Awards at Caltech**

Effective October 1, 2010 approval from the Provost's Office will be required if it is necessary for Caltech to receive any export controlled information and/or technical services from the sponsor, or a third party, in order to carry out a sponsored research project.

The Provost's Office review will take place at the earliest possible time in the proposal preparation/submission process. To facilitate this process, the Divisional Approval Form (DAF) is being revised to include some questions about the need to obtain export controlled information and/or technical services in order to carry out the project.

JPL Research Interdivisional Authorizations (IAs)

The initial focus will be on the JPL Research IAs so that we can implement the new procedures currently under development between the Campus and the Laboratory. The requirement for Provost's Office approval has been incorporated into the JPL IA procedures.

All Other Research Projects

The Caltech Standard Research Agreement will be revised and, where appropriate, will incorporate language pertaining to export control issues. The following terms and conditions will be included:

- Sponsor does not plan to provide any export controlled information or technical services to Caltech in the conduct of this project.
- The sponsor will notify Caltech's Institutional Official if this situation is expected to change. Notification will occur prior to providing any export controlled materials or services to Caltech.
- Caltech will have the right to refuse acceptance of export controlled information and technical services.
- If export controlled information or technical services are provided to Caltech, the initial point of contact for Caltech will be the Institutional Official.
- All export controlled information to be sent to Caltech will be clearly marked.

The purpose of these new procedures is to minimize the risk of inadvertent or unknowing acceptance of export control restrictions and thereby also minimize the likelihood of violations of those regulations.

Questions should be referred to David Mayo in the Office of Sponsored Research or Adilia Koch in the Export Compliance Office.