Export Controls Training Plan

The Export Controls Compliance Program at K-State is designed to support K-State employees, students, and departmental units in complying with the export controls laws and regulations of the U.S. Federal Government. They include the International Traffic in Arms Regulations (ITAR) administered by the Department of State, the Export Administration Regulation (EAR) administered by the Department of Commerce, and economic and trade sanctions implemented through the Office of Foreign Assets Controls (OFAC) of the Treasury Department.

Export controls regulations can affect several research, academic, and business activities, including, but not limited to, conducting research, hosting international visitors, international collaboration, international travel, hiring, procurement and purchasing, international shipments, and other financial related transactions. All K-State faculty, staff, and students must be aware of how export controls relate to their work, so as to minimize the risk of noncompliance. Without training individuals would likely not recognize how activities they engage in may result in violations.

Training is a key part in creating and maintaining a culture of compliance. K-State maintains a subscription to online export controls training courses offered through CITIProgram (citiprogram.org). To minimize the risk for our faculty, students, and staff, export control training will be required for the following categories of employees:

- All staff in the Office of Vice President for Research
- All grant recipients
- All persons identified in proposed Technology Control Plans (TCPs)
- All supervisors submitting requests to hire foreign nationals (non-immigrant employees)
- All employees submitting requests to host an international visitor
- All units and department heads
- All employees in the units under Office of International Programs including Education Abroad, ISSS, and International admissions
- Study abroad organizers submitting a request for study abroad programs
- All employees identified on a protocol – IRB, IBC, and IACUC
- Other university employees may be required by supervisor and/or VPR/URCO to take export control training depending on the nature of their responsibilities

Training Modules:

The basic training module is required for all groups. However, the URCO may assign another module based on an employee's activities or responsibilities. URCO will be

happy to deliver additional customized training for certain groups or individuals, as appropriate.

Training Assignment and Frequency: For new employees, training will be assigned by the supervisor/department at the time of employment. For existing employees, training will be required as soon as this Training Plan is approved and adopted.

URCO will be responsible for ensuring that TCP participants have taken the training, prior to approval of a Technology Control Plan.

Training shall be renewed every three years. A supervisor or URCO may require additional training based on an individual's responsibilities.

Monitoring: The following offices will be responsible for verification of training:

- Staff in the Office of Vice President for Research – Office of VPR
- Grant recipients - Office of Pre-Award Services
- Persons identified in Technology Control Plan (TCP) - URCO
- Supervisors submitting requests to hire foreign nationals (non-immigrant employee) - Department head (or designee) and/or URCO
- Employees submitting requests to host an international visitor - Department head or designee and/or URCO to verify
- All units and department heads – Associate Deans for Research
- All employees in the units under Office of International Programs including Education Abroad, ISSS, International admissions - Associate Vice Provost, Office of International Programs
- Study abroad organizers - Associate Vice Provost, Office of International Programs
- Employees identified on a protocol – IRB, IBC, and IACUC - URCO
- Other university employees as may be required by supervisor and/or VPR/URCO - URCO

* Access to the URCO training database will be provided to a POC for each Department to verify training records.

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