Export Controls - Training

General
The Office of Sponsored Programs is required to maintain a export compliance program in place for its University population. In order to achieve this, regular training with refreshers is necessary. The Export Control Office has developed a three-level training program based on the laws and regulations and the assessed need. The three levels or “tiers” are as follows:

- **Tier One** – done annually by means of an oral presentation, it targets:
  - Provost and the Academic Council
  - Department Heads

- **Tier Two** – done by means of a structured training program (CITI) and accompanying test and is required for all faculty and any individuals sourced on a project that has been designated as ‘export controlled’ by the Export Control Officer and identified in a Technology Control Plan (TCP). Normally, this must be completed before the KFS account number will be released by OSP to the Principal Investigator. Tier two targets:
  - Principal Investigators
  - All other individuals sourced on the project and having access to the controlled technology

- **Tier Three** – done annually by means on-line CITI training or an oral presentation, it targets:
  - OSP and OSA staff

Additionally, a memo distributed annually by the Provost and Vice Provost for Research. The memo provides a brief description of Export Control circumstances and provides a hyperlinked URL to the appropriate section of the OSP webpages where additional information can be obtained. It targets:

- All faculty, including those not working directly on sponsored projects
- All students and staff

CITI Collaborative Institutional Training Initiative

The CITI Program is a subscription service managed through the Office of Sponsored Programs that provides ethics education to all members of the research community. If you are new to CITI, log on at [“New Users - Create Account.”](#). You’ll need to provide all required registration information which will include identification of your university organization affiliation as Stevens Institute of Technology.

The institutional requirement for training at Stevens as it regards export controls is that all PIs and anyone supported on an export controlled project must take the CITI training and pass the associated quiz. In order to be supported on an export controlled project you must be a U.S. person. This is defined at [22 CFR 120.15](#) as:

“…a person (as defined in § 120.14 of this part) who is a lawful permanent resident as defined by 8 U.S.C. 1101(a)(20) or who is a protected individual as defined by 8 U.S.C. 1324b(a)(3). It also means any corporation, business association, partnership, society, trust, or any other entity, organization or group that is incorporated to do business in the United States. It also
includes any governmental (federal, state or local) entity. It does not include any foreign person as defined in § 120.16 of this part

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