THE UNIVERSITY OF ALABAMA IN HUNTSVILLE (UAH)
EXPORT CONTROL TECHNOLOGY CONTROL PLAN (TCP)

FEBRUARY 2023

Denise K. Spiller, Director Office of Research Security

Export Control Compliance Officer

The University of Alabama in Huntsville

Von Braun Research Hall, Annex

THE UNIVERSITY OF ALABAMA IN HUNTSVILLE (UAH)

301 SPARKMAN DRIVE HUNTSVILLE, ALABAMA 35899

1. SCOPE

This Technology Control Plan (TCP) applies to all elements of The University of Alabama in Huntsville and all activities/locations, which relate specifically to the access and support of Export Control Information to include ITAR, EAR and Controlled Unclassified Information (CUI) information.

2. PURPOSE

The purpose of this TCP is to ensure there is no unauthorized access to this type of **Information, Technology and/or Hardware** regardless of where the information is stored.

3. GENERAL GUIDANCE

A. No employee or other person acting on behalf of The University of Alabama in Huntsville will, without prior approval be allowed access to this **Information, Technology and/or Hardware** stored at the University campus. This approval will be granted through the Office of Research Security (ORS) located at Von Braun Research Hall, Annex.

B. Sufficient control and supervision will be exercised over The UAH employees, students, and visitors, especially those with foreign national status, with regard to this **Information, Technology and/or Hardware**. **No Foreign Person** will be granted access to this information under any circumstances, **w**ithout a License or TAA that has been submitted from ORS and issued by the State or Commerce Department, NO exceptions.

C. ORS will further ensure that access to this information will be granted only to authorized persons for whom a strict **"need to know**" has been established.

D. All individuals requiring access to the information will be required to complete the annual on-line Export Control briefing. This Initial Briefing will be completed prior to access granted.

E. There will be a limitation to individuals having keys to Rooms or Labs on campus where the information is stored and/or supported. All of these individuals prior to gaining key access will have their citizenship verified, training completed, and will need to sign a Technology Control Plan through the ORS office.

F. UAH, Security Administrator, Denise Spiller, telephone 256-824-6444, and the Export Control Compliance Officer/Assistant Security Administrator, Janine Wilson, Associate Security Administrator, telephone 256-824-6048 are the points of contact for this Technology Control Plan.

4. U.S. PERSON VERIFICATION

All personnel directly associated with Export Control ITAR/EAR information will be U.S. Citizens. Anyone having access to the area/lab that contains Export Control ITAR/EAR

information that is not a U.S. Citizen will be escorted at **ALL** times.

Definition of U.S. Person - a natural person who is a lawful permanent resident as defined in 8 U.S.C. 1101(a)(20) or who is a protected individual as defined by 8 U.S.C. 1324b(a)(3))

5. UNCLASSIFIED DATA

When the information is unclassified, Controlled Unclassified Information (CUI), For Official Use Only (FOUO) or Export Control ITAR/EAR information it will be properly marked to reflect such.

6. TERMINATION OR DEPARTURE

Upon termination of employment or departure from The University of Alabama in Huntsville, the individuals having access to the Export Control Restricted Areas that maintain the information will be required to turn in all keys to the area and be debriefed from the project.

7. EXPORT CONTROL INFORMATION, TECHNOLOGY AND/OR HARDWARE TRANSFER:

A. ORS will ensure that the receiver of the information has storage capability and need to know to receive the information.

B. ORS will ensure that each individual having access to the information will be properly briefed (Completed On-line Export Control Training and Controlled Unclassified Information).

C. The Office of Research Security and the Information System Security Manager (ISSM) will ensure that once the information is stored here on campus it will be protected as required.

D. All Export Control information ITAR/EAR at the minimum will be placed in a locked storage cabinet, room, etc. **There is no "requirement" per say but due diligence the more layers of protection the better.**

8. PHYSICAL PROTECTION:

Key access to labs or offices where the information is stored will be kept a strict minimum and protection of those keys.

9. INFORMATON SYSTEMS:

Information Systems that transmit, compute or store this level of information shall be approved by ISSM via a TCP. The systems will also be protected by:

A. Limiting access to the IS to ORS approved personnel.
B. Updating software at a minimum of monthly.
C. Using passwords of at least 8 characters in length, containing at least 3 different character sets and changed every 180 days.
D. Enabling screen locks after a 15-minute timeout.
E. Utilizing an ORS approved whole disk encryption application to encrypt all data at rest and industry trusted encrypted transfer applications for data in transit.

F. Restricting other usage of the IS, to reduce the risk of inadvertent security breaches.
G. Disabling unneeded services.
H. Utilizing UAH approved antivirus solution.
I. Disposing of all media storage devices, including, but not limited to, hard drives, floppy diskettes, usb storage devices, CDs or DVDs by physical destruction methods.
J.

10. REPORTING

Any violations of or problems with this Technology Control Plan will be reported to the UAH Director Office of Research Security, at 824-6444, the UAH ISSM, at 824-2623 or the Associate Security Administrator, at 824-3025. Suspicious behavior, possible compromises and violations all must be reported.

11. RECORDS

All UAH records pertaining to Export Control Information will be retained and maintained at the University of Alabama in Huntsville (UAH) for a period of five (5) years from the date of transaction.