

UCAR Export Compliance Training Plan

Training Focus:	Export Compliance
Training Period:	2020

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Version	Date	Comments
1.0	1-1-2017	1 st draft
1.01	1-10-2017	2 nd draft
1.1	2-14-2017	Final
2.0	10-27-2017	Revised for 2018
3.01	11-19-2018	Revised for 2019
3.02	1-1-2020	Revised for 2020

Introduction

Export Compliance Coordinators (ECCs), Empowered Officials (EOs) principal investigators (PIs), lab administrators, system administrators, and research scientists require varying degrees of understanding of export compliance laws, regulations, and internal policy and procedure depending on the type of projects they may be working on.

This training plan outlines the requirements and methods needed to provide appropriate training on export compliance at UCAR.

Training Scope

Training Objectives

This training program has been established to provide the proper level of training needed for a range of roles and responsibilities, from those who need a basic understanding of export compliance requirements to those who require detailed, in depth understanding of access controls, licensing, and documentation requirements. Training methods, content, and frequency will vary depending on the level of an individual's involvement in export controlled projects.

Assumptions

The Export Compliance Program Manager, in the capacity of subject matter expert, will help to develop the training materials. The responsibility for developing, delivering, and administering training remains with HR EOD Training Manager.

Training Program

Training Prerequisites

There are no prerequisites before participating in export compliance training. It is expected that participants will select specific training based on their own individual knowledge, experience levels and immediate needs.

Types of Training

Type	Title	Description	Method	Duration	Participants	Responsible Party
1	Introduction to Export Controls (Workday)	Specific information on federal laws, UCAR policies, and best practices that will help you comply with export regulations	Web based training available 24/7 that includes a quiz	1 hour	Required for all scientists, engineers, and software engineers; highly recommended for all staff working on DoD funding projects, and for staff working on projects that involve export controlled items or technology, or are responsible for transactions or contracts with non-US entities	HR
2	Visual Compliance Research Edition	ECCN Classification and Restricted Party Screening	Online on demand webinars 24/7	1 hour	Highly recommended for all interested staff, especially, ECCs and EOs with export controlled projects	Third Party

3	ECC Meetings	Rotating topics based on UCAR policy, procedure and interpretive guidelines and best practices.	Quarterly meetings	90 minutes	Required for Export Compliance Coordinators (ECCs); optional for Empowered Officials (EOs)	ECPM
4	Export Controls for Research Institutions	Bi-annual training on the basics of export compliance led by a third party subject matter expert	On-site seminar	2 hours	Highly recommended for all interested staff	Third Party
5	Export Controls for ECCs, EOs, PIs, Administrators, Systems Administrators, and Lab Directors	Bi-annual training led by a third party subject matter expert	On-site seminar	2 hours	Highly recommended for all ECCs, EOs, PIs, Administrators, Systems Administrators, and Lab Directors who work on projects that involve export controlled items or technical data	Third Party
6	Off-site training provided by commercial entities	Export Compliance Training Institute (ECTI); Society for International Affairs (SIA); Bureau of Industry and Standards (BIS)	Commercial training provided at various locations in the US; locations, schedules, and cost are on provider websites.	2-4 days	Highly recommended for all interested staff, especially, ECCs and EOs with export controlled projects.	Third Party

Training Schedule

Training	Date	Facilitator	Location
Complying with U.S. Export Controls	June 17-18, 2020	BIS (Bureau of Industry and Security)	Denver
2020 Winter Conference	February 24-26, 2020	SIA (Society for International Affairs)	Las Vegas
2020 Fall Advanced Conf	TBD	SIA (Society for International Affairs)	TBD
AUECO 2020 Annual Conference	April 27-29, 2020	AUECO (Association of University Export Control Officers)	Philadelphia
University Export Controls 2019	Sept 28-Oct 1, 2020	ECTI (Export Compliance Training Institute)	Ohio State University
ECC Meetings	TBD	ECPM	UCAR On-Site
Screening	On demand	Visual Compliance	Online
Introduction to Export Controls (required annually for all scientists, engineers, and software engineers)	Any time 24/7	Workday Learning	Online
Export Controls for Research Institutions	Tentative for 2021	Don Fischer	UCAR On-Site
Targeted Training for Labs	Upon Request	ECPM	UCAR On-Site

Trainings do not use conference call in, webcast, or Google Hangout, and are not recorded for playback at a later date. Attendance in person is required.

Roles and Responsibilities

Guidelines associated with UCAR Policy 1-6 Export state that within one month of commencing work, export compliance training is mandatory for all UCAR scientists, engineers, and software engineers, regardless of whether known export controlled items or technical data are involved. It is the responsibility of entity directors, in coordination with Administrators and Export Compliance Coordinators, to ensure that export compliance awareness training has taken place and is documented. Training must be refreshed annually.

Individual Department Entity	Responsibilities
Export Compliance Program Manager (ECPM)	Assist and guide HR EOD Manager with training development
HR EOD Manager	Develop and administer training program on an ongoing basis. Lead and coordinate with labs, programs and departments regarding compliance with training requirements.
ECC (Export Compliance Coordinator)	Assist staff with obtaining relevant training. Coordinate with HR EOD Manager and ECPM to ensure adequate training for their area of responsibility. Verify and document lab/program training by staff. Participate in ECC meetings and disseminate information to staff. Provide guidance and seek assistance as needed.
EO (Empowered Official)	Act as a resource for staff. Participate in export training annually. Encourage others to obtain training.
Lab and Program Director	Provide management support for export training.
PI	Ensure that staff scientists, engineers, and software engineers have been trained in export compliance according to policy.
Lab and Program Administrator	Assist and support PI, Directors, EO, ECC, HR EOD Manager in obtaining required training within their area of responsibility
All Staff	All staff are responsible for obtaining export compliance training that is needed within their job requirements at UCAR.

Budget and Expenses

On-site training activities are budgeted by the Export Compliance Program Manager, including all expenses for bringing in subject matter expert contractors for on-site training.

Expenses associated with third party providers off-site or webinars are the responsibility of each lab/program/department. This includes travel costs, course fees, conference registration, and related expenses.