

UA EXPORT CONTROL REVIEW CHECKLIST: SUBAWARDS

Liaison:	Date:
UA PI & Dept.:	UA Sponsor:
Subrecipient:	Subrecipient PI:

The University Export Control Program (UECP) is required to review subawards which may result in export-controlled technologies, information, or equipment be provided to the subrecipient. ***If you answered YES to any of the questions below***, please forward the Checklist and the other requested information to UECP (export@arizona.edu) for review prior to issuing the subaward. UECP will contact the university department and principal investigator (PI) to clarify the project requirements and determine if additional controls are required.

- ▶ If the subrecipient’s project is export controlled, or UA will be exchanging export-controlled data and information with the subrecipient, then prior government approval (export license) most likely will be needed if subrecipient is a foreign entity.
- ▶ If the subrecipient is a U.S. institution, then the institution should be notified of the export-controlled nature of the project, data, information, or equipment before signing the subcontract.
- ▶ However, if the PI at the U.S. institution is a non-U.S. person, then prior government approval will be needed before UA can give the PI certain export-controlled data, information, or equipment.

UECP will apply for any required government approvals and will notify Subcontracts when the license is received. The subcontract should not be signed without coordinating with UECP.

	YES	NO
1. Did Visual Compliance (VC) Restricted Parties screening result in an <u>exact</u> match (“hit”) for subrecipient institution or subrecipient PI?		
2. Is the project export controlled (i.e., is there a technology control plan (TCP) associated with the UA project)? If yes, UECP will need the prime agreement account number and the subaward statement of work to make an export control determination. NOTE: UECP does not need to review OSIRIS-Rex subawards <i>unless</i> the subaward is to a foreign entity (individual, company, institution).		
3. Is the subaward being issued to an entity located in Cuba, Iran, North Korea, Sudan, or Syria? NOTE: If the entity is located in Cuba, Iran (most restrictive), North Korea, Sudan, or Syria, an OFAC and/or other export licenses most likely would be required. UECP should be contacted immediately.		