## **Ancillary Review for Export Control**

This document outlines the process for Ancillary Review from Export Control during the proposal preparation stage.

The following are some examples for when an Export Control Review may be required:

- Sponsor guidelines indicate the project is likely to be subject to Export Control regulations.
- The Funding Proposal Smartform indicates that the work will involve any military or defense articles including software or technology.
- PI participates in a foreign talent recruitment program or any of the Compliance page questions related to foreign involvement are answered Yes.
- Sponsor is an Entity of one of the embargoes countries.
- Visual Compliance review indicates area of concern.

Once it is determined that an Export Control Review is needed on a Funding Proposal, an Ancillary Review will be created by the Pre-Award Specialist and sent to the Export Control Organization for review.

#### How to request an Export Control Ancillary Review

Follow these steps to create an EC Ancillary Review:

1. Select "Manage Ancillary Review" from the Funding Proposal Workspace.

Manage Ancillary Reviews

2. Click Add on the Manage Ancillary Review pop-out screen.



- 3. Select the Export Control Organization.
- 4. From the review type drop-down, select Export Controls.
- 5. Select 'Yes' for Response Required if a response is needed prior to proposal submission.
- 6. In the Comments field provide the following:
  - a. If a response is required in less than 5 days, include "URGENT" as the first word in the Comments section.
  - b. Include specific instructions in that include:
    - The reason for review.
    - Add the page number in the guidelines of section for review.
    - o Information regarding any military or defense articles.
    - Foreign talent program details.
    - Embargoes Country information.
    - Visual Compliance review results.
    - Enter the date a response is required (calculate 5 days prior to sponsor due date)
    - Include the file name of all documents that may require review and a short note about the document.
- 7. If any forms require signature add the attachment to the Supporting documents section.
  - If the EC Review is a result of a Visual Compliance Screening, include the PDF attachment.

Add Ancillary Review		
1. * Select either an organization or a person as reviewer:		
Organization:		
Person: ···		
2. * Review type:		
Export Controls		
<ul> <li>3. * Response required?</li> <li>● Yes ○ No <u>Clear</u></li> <li>4. Comments:</li> </ul>		
Include specific instructions in that include: *The reason for review. *Add the page number in the guidelines of section for review. *Information regarding any military or defense articles. *Foreign talent program details. *Embargoes Country information. *Visual Compliance review results. *Enter the date a response is required (calculate 5 days prior to sponsor due date) Include the file name of all desumants that may caute cauter and a short 5. Supporting documents:		
+ Add		
Name		
Export Control Sample.pdf(0.01)		
* Required	OK OK and Ad	d Another Cancel

- 8. Click OK on the Add Ancillary Review tab to Save.
- 9. On the Manage Ancillary Review page, verify the information is correct for the Ancillary Review and select OK. This will send an email notification to the individuals in the Export Control Organization and place this Funding Proposal in their inbox.

\*\*All individuals that are included in the Export Control Organization will receive a system generated email with information related to the Review request. The Funding Proposal will also appear in the Inbox on the individual Dashboard.

### \*\*Is there classified work?

When classified work is involved, and Export Control Ancillary Review is required.

**Common Indicators** 

- NISPOM (Executive Order 12829) or DD254 referenced in the RFP/BAA
- PI indicates that classified work is involved
- Send Ancillary Review to Export Control. Include the following information in the comment section:
  - Pre-Award Classified work identified
  - Indicate how the work was identified as classified, the proposal due date, and any indication of urgency.
     Provide a link to or copy of the RFP/BAA, if applicable and RFP/BAA is not classified.

# \*\* NEVER include any documents or information in PERA that may be considered classified.

- Do NOT submit the proposal until the Export Control Ancillary Review is complete.
  - Additional budget items may be required.
  - Include Export Control for Classified Work in the PERA Proposal Notes

### How to Submit an Export Control Ancillary Review

Follow the steps below to submit (approve/deny) an ancillary review:

- 1. Access the record in one of two ways:
  - a. From the system generated message received via email, click on the "Grant ID" link. This link will direct you to the Funding Proposal Workspace of the proposal needing review.

Link:	FP00000391
PI:	Rebecca Simms (pi)
Title:	PI Last Name - Sponsor - Title
Required:	Yes
Description:	A Funding Proposal has been assigned to you for ancillary review. Click the link above to access and review the submission.
Comments:	Include specific instructions in that include: *The reason for review. *Add the page number in the guidelines of section for review. *Information regarding any military or defense articles. *Foreign talent program details. *Embargoes Country information. *Visual Compliance review results. *Enter the date a response is required (calculate 5 days prior to sponsor due date) Include the file name of all documents that may require review and a short note about the document.
Supporting Document Export Control Sample.	ts: <u>pdf</u>

b. Select the name of the proposal provided in the email from the My Inbox or My Reviews tab.

Dashboard	Admin		Ag	reements	Facilities	Gra
or Jenny Siemers						
Create 👻	My Inbox	Assignments	In Process			
	My Inbox					
cently Viewed	Filter by 🚱 🛛	D .	Enter text	to search	Add Filter X Clear All	
Recent Plined	ID		Name		Date C	Created
FP00000391: PI Last Namensor - Title 🖈	FP00000391		PI Last Na	me - Sponsor - Title	6/3/20	24 1:17 PM
Recent Pinned FP00000391: PI Last Namensor - Title 🖈	ID		Name PI Last Na	me - Sponsor - Title	Date 0 6/3/20	Created 24 1:17 PM

- 2. On the Proposal Workspace, select the Attachments tab to View the Attachments listed in the Comments section of the email.
- 3. If clarification is required email the Pre-Award Specialist and/or Project Director to resolve.

- 4. If a form requires signature, download, complete and sign the form.
- 5. To approve the Ancillary Review, from the Activity List, select Submit Ancillary Review.

Draft
Next Steps
View Funding Proposal
Printer Version
COI Disclosure Status
Manage Ancillary Reviews
Submit Ancillary Review
🏟 Manage Tags
1 Add Attachments

- 6. A new page will open.
  - a. From this new page, select the Ancillary Review to be submitted.
  - b. Select Yes/No for questions 2 and 3.
  - c. Add Comments and Supporting Documents if applicable.
     o If a form required signature, attach it here.

NOTE: Documents uploaded to the Ancillary Review approval/denial become a permanent document in the Funding Proposal.

### d. Select OK, the Ancillary Review is complete.

1. 9	Select the Review you are s	ubmitting:		
	Organization	Person	Review Type	Required
		Jenny Siemers Test	Export Controls	yes
		Jenny Siemers Test	PI/Co-PI Certification	yes
		Jenny Siemers Test	FCOI Costing Review	yes
2.*	Do you accept this submis ) Yes () No <u>Clear</u>	ssion? Ø		
3.*	Yes O No <u>Clear</u>	ipiete? 😧		
<b>4</b> . <b>0</b>	Comments:			
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	Name			
	There are no items to display			