



Export Compliance Plan Standard Operating Procedure (SOP) Business & Financial Services Procurement Services Purchasing	
Document Number:	ECP-20212311-SOP7
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INTRODUCTION

This Standard Operating Procedure (“SOP”) outlines processes used to foster a culture of compliance with U.S. Export Controls¹ and the University of California - Policy on Export Control (“Export Control Policy”)². This SOP is in furtherance of the local Export Compliance Program Plan (“ECP”) maintained and regularly reviewed and updated by the Export Control Office.

PURPOSE

Activities performed by Procurement Services³ may involve controlled products⁴, materials, equipment, software, and technology (“items”) or services and could be subject to export licensing requirements. As a result, this SOP establishes basic and minimal responsibilities⁵ for UCR Procurement Services, with the objective of providing guidance on how to assess export control restrictions of purchased items or services; and identify transactions that require escalation to the Export Control Office for further review and assistance.

RESPONSIBILITIES

In general, Procurement Services are responsible for:

- Performing Restricted Party Screening (“RPS”)⁶, using Visual Compliance for all foreign entities, vendors, suppliers, persons, or subcontractors (collectively herein, “contracted party or parties”) before entering any sales and service or purchasing agreement, or purchase order.
- When warranted, ensure that all sales and service agreements, purchasing agreements, or purchase orders (collectively herein, “purchasing documents”) include appropriate export control clauses.
- Requesting that all contracted parties complete an ‘Export Control Classification Request (“ECCR”)' form for any furnished, purchased, or subcontracted items, technology, or software prior to purchase.

¹ U.S. Export Controls include without limitation the Export Administration Regulations (“EAR”), International Traffic in Arms Regulations (“ITAR”), and regulations and orders administered by the Treasury Department’s Office of Foreign Assets Control (“OFAC”)

² University of California – Policy on Export Control dated June 21, 2018, as amended. <https://policy.ucop.edu/doc/2000676/ExportControl>

³ UCR Procurement Services consists of Business Contract and central Purchasing.

⁴ Controlled products do not include controlled substances subject to the regulatory jurisdiction of the FDA.

⁵ This procedure uses basic and minimal responsibilities, which may vary from one contracting office to another.

⁶ Review Standard Operating Procedure ‘**Restricted Party Screening (RPS), End-Use & End-User Checks**’ for instructions on how to perform RPS. <https://exportcontrol.ucr.edu/documents-and-procedures>



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- When identified, escalate to the Export Control Officer any potential export control “Red Flags” (as defined in the section below), or export-controlled items or services in a sales and service contract or agreement, purchasing agreement or order.
- Retaining all relevant export control documents related to the sales and service contract or agreement in accordance with applicable recordkeeping requirements.

EXPORT CONTROL REVIEW AND ESCALATION

The following steps are provided as a guide to assist Procurement Services on how to assess export control restrictions of purchased items or services and identify transactions that require escalation to the Export Control Office for further review and assistance.

S1. Restricted Party Screening (RPS)

Perform RPS using Visual Compliance for all foreign contracted parties in accordance with [Standard Operating Procedure \(SOP\) Restricted Party Screening \(RPS\), End-Use & End-User Checks](#), and determine if any Red Flags are present that warrant escalation to the Export Control Office for further review.

Red Flags may include:

- The contracted party is identified on a U.S. government restricted party list.
- The contracted party is located in a sanctioned country or country of concern such as: Cuba, Iran, Syria, North Korea, Russia, Belarus, or Ukraine. (Refer to the U.S. Department of Treasury Sanctions Programs and Country Information for current listings: <https://home.treasury.gov/policy-issues/financial-sanctions/sanctions-programs-and-country-information>).
- The contracted party is a defense contractor (foreign or domestic), foreign government, foreign military, or Military End User, whether direct or indirect.

S2. Purchasing documents

Review all purchasing documents received from the contracted party to determine if any Red Flags are present that warrant escalation to the Export Control Office for further review.

Red Flags may include:

- i. Purchasing documents that include export control markings, or restrictive language such as:
 - i. “Export controlled” or “Classified”
 - ii. “Subject to” or “Restricted for export by”:
 - the International Traffic in Arms Regulations (“ITAR”) or “USML category”
 - the Export Administration Regulations (“EAR”) or “Export Control Classification Number” (“ECCN”)
 - the U.S. Department of State (“DoS”) or Directorate of Defense Trade Controls (“DDTC”)



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- the U.S. Department of Defense (“DOD”) or the Defense Advanced Research Projects Agency (“DARPA”)
 - the U.S. Department of Energy (“DoE”) or the Nuclear Regulatory Commission (“NRC”) or other regulatory authority
 - iii. “No foreign nationals” or “Restricted to US persons only”
 - iv. “US only” or “US Persons Only” or similar restriction
 - v. “Controlled items” or “restrictive access”
 - vi. “Controlled technical information” or “controlled equipment”
 - vii. “EUS required” or “End-user statement must be provided prior to purchase or order acceptance”
 - viii. “Compliance with Export Control Regulations” or “Certification with all export control laws is required”
 - ix. “Embargoed Countries” or references to Cuba, Iran, North Korea, Syria, Sudan, Russia, Belarus, or Ukraine
- ii. Purchasing documents that indicate the items or services being purchased are:
- i. “defense articles” or “defense services”
 - ii. “emerging” or “sensitive technologies”
 - iii. “controlled products, equipment, materials, or technology” such as:
 - Navigation, Avionics, Radar equipment
 - Night vision equipment, infrared cameras, and thermal imaging devices
 - Space-related technology including satellites and radiation-hardened components
 - Viruses, and biological agents
 - Nuclear items including radioactive materials
 - Military-grade SENSORS
 - Naval equipment such as Sonobuoys and submersible vessels
 - Military communications systems or high-frequency radio apparatus
 - Military gear or items with ruggedized components
 - Unmanned aerial vehicles (UAVs)
 - Advanced Lasers
 - Gas monitoring or filtration devices
 - Spectrometers
 - Gravimeters

REQUESTS FOR EXPORT CONTROL CLASSIFICATION

To ensure compliance with applicable export control requirements, UCR needs to obtain information concerning the export control classification for any items provided to UCR. As a standard practice, Procurement Services must ensure the following actions prior to order placement/acceptance:



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- All contracted parties must complete an Export Control Classification Request (“ECCR”) form shown in Appendix B, or its equivalent, for any furnished, purchased, or subcontracted items.
- ECCR’s must be fully completed and duly signed by the contracted party before being returned to UCR.
- Completed ECCR’s must be sent to the Export Control Office for review and acceptance.

Note: For repeat purchases of the same item, if a completed ECCR form has been received and accepted in the past 12 months, a new ECCR form is not required unless:

- i. a change in export control classification information is identified by the contracted party, or
- ii. the item is being provided by a new contracted party, or
- iii. updated export control information is requested by the Export Control Office.

In the event a contracted party does not provide a completed ECCR form, Procurement Services must alert the Export Control Office to assist with self-classifying of the item and its associated technology.

Depending on the items involved, the Export Control Office may contact the Principal Investigator (“PI”) to ensure that any controlled items are secured under a Technology Control Plan (“TCP”), and to determine if there are any deemed export concerns. All controlled items that are purchased should be labeled. This includes computers on which any controlled software is installed. Both technology and information about technology that are controlled, such as operating manuals, technical specifications, etc., should be labeled and stored securely. It can take a few months to obtain an export license from the U.S. Government, so please contact the Export Control Office with as much advance notice as possible.

RECORDKEEPING

All documents created or modified in the performance of this SOP shall be retained and managed in accordance with relevant Export Control regulations and as captured in the UC Records Retention Schedule⁷. In the event of conflict between the retention periods in the regulations and the UC Records Retention Schedule, the periods specified by the regulations shall take precedence. If the controlling agencies have no stated requirements, records should be kept no longer than as required by the UC Records Retention Schedule.

TRAINING & RESOURCES

For additional information and training materials on export controls, please visit UCR’s Export Control website and click on [Training Resources](#).

For a simplified quick reference of this SOP, please click on the following infographic link: [Export Control for Purchasing](#).

⁷ University of California – Records Retention Schedule <https://recordsretention.ucop.edu/>



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QUESTIONS

Please contact the Export Control Office at exportcontrol@ucr.edu with any questions or concerns regarding the contents and applicability of this SOP.



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APPENDIX A – REVISION HISTORY

Date	Reason	Notes
11/30/2021	Final Version Release	Initial Release
07/06/2022	Updates include 1) clarification of responsibilities; 2) updated Export Control Review and Escalation steps; 3) updated Request for Export Control Classification steps; 4) inserted Training & Resources section; and 5) deleted Appendix A and B “Infographic” and renamed Appendix C “ECCR” form as Appendix A	
09/23/2025	Updated format, headers, and made minor grammatical changes throughout for simplified reading. Renamed Appendices and updated hyperlinks.	



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APPENDIX B – EXPORT CONTROL CLASSIFICATION REQUEST

An electronic version of this form can be found under forms at: <https://exportcontrol.ucr.edu/documents-and-procedures>

Export Control Classification Request (ECCR)				
This form must be completed for any furnished, purchased, or subcontracted items, technology, or software provided to UCR. Completed forms must be duly signed and dated before being returned to UCR Procurement Services.				
Supplier Information	Name		Phone Number	
	Address		Email Address	
	City / Country		Website	
Manufacturer Information <i>(if not Supplier)</i>	Name		Phone Number	
	Address		Email Address	
	City / Country		Website	
Item Information <i>(please attach a separate sheet for multiple items)</i>	Description			
	Supplier Part Number			
	Manufacturer Part Number			
	Serial Number <i>(if applicable)</i>			
Export Control Classification Information	Is the item, technology, or software subject to U.S. export control regulations?		<input type="checkbox"/> Yes <input type="checkbox"/> No	
	If yes, what is the export jurisdiction?		<input type="checkbox"/> EAR <input type="checkbox"/> ITAR	
	If subject to the EAR, what is the Export Control Classification Number (ECCN)?			
	If subject to the ITAR, what is the U.S. Munitions List (USML) Category number?			
	What is the <u>Schedule B</u> number?			
	What is the HTS Code?			
	Is the item, technology, or software subject to a foreign country export jurisdiction?		<input type="checkbox"/> Yes <input type="checkbox"/> No	
	If yes, what is the country and jurisdiction?			
Signature	I hereby certify that the information provided herein is true, accurate and complete and if a change in circumstances causes my responses to no longer be accurate or complete, or if my discovery of additional information reveals that any response herein is inaccurate or incomplete, I will immediately notify UCR Procurement Services of any change by written notice.			
	Name			
	Title			
	Date			