



USG TECHNICAL DATA MARKING CONTROLLED UNCLASSIFIED INFORMATION (CUI) PROCEDURE

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Effective Date: October 23, 2019

Revision History: Noted Below

Responsible University Officer: Vice Provost for Research

Responsible Offices: Office of Research Administration
(ORA)

Procedure Statement

This standard operating procedure (SOP) document supports the University of Miami's (UM) policy for USG Technical Data Marking as a compliance control tool to safeguard and control information, can alert holders by identifying the technical data and provide instructions for handling of the data. The SOP is to furnish guidance with a tailored approach for USG Technical Data Marking procedures at UM. **(NOTE: The SOP is "ONLY" for Managed Controlled Program contracts that contain a requirement for "deliverables" to be "marked with a suitable notice or legend".)**

Reason for the Procedure

In response to USG contract requirements, federal regulations and UM policy on export controls and technical marking, documents subject to Fundamental Research, Controlled Unclassified Information (CUI) and Export Control under the ITAR and/or EAR are generally marked as per U.S. Government regulations. The most common practice involves the marking of an entire document such as an engineering drawing package, technical report, software simulations, mishap investigation report, or technical presentation are marked by the proper marking regiment.

Who should Know this Procedure?

Provost, Vice Provosts, Deans
Associate Vice President for Research Administration
Director of Export Compliance
Research Administrators
Principal Investigators (PI)
Office of Research Administration
(NOTE: The SOP is "ONLY" for Managed Controlled Program contracts.)

Definitions

UM	University of Miami
USG	United States Government

Procedures

The USG Technical Data Marking - "Controlled Unclassified Information (CUI)" procedure is for research documents, presentations, software simulations and technical data that contain required contract language for "deliverables" to be "marked with a suitable notice or legend". Recent USG contract language has included markings requirements to safeguard and control information. CUI markings are determined by the USG Contract Officer. Mandatory CUI Banner Markings must appear on the top portion of the page and centered at bottom of the page. (UM-ECO will furnish additional training in the event CUI data is provided.) The procedure will assist authorized holders in the handling, receiving, identification, and storage of documents due to USG contract requirements and terms.




USG TECHNICAL DATA MARKING CONTROLLED UNCLASSIFIED INFORMATION (CUI) PROCEDURE

Step	Responsibility	Action
1	ORA/ECO	ORA/ECO training of the PI and Research Team pertaining to the USG marking requirement in the contract. Training will be conducted through a Technology Control Plan (TCP) on the "how to mark" the deliverables as per the contract.
2	PI	Drafting of the engineering drawing package, technical report, software simulations, mishap investigation report, or technical presentation.
3	PI	Insertion of the Controlled Unclassified Information notice on front cover in a font size that is readable when printed, and the Contract Number in the header and footer.
4	PI	Insert in the remaining pages: "CUI" and the Contract number into the center of the header and footer in a font size that is readable when printed.
5	PI	Files and stores data in the proper electronic secure storage. (UM Secure Box – Cloud Based.)
6	ORA/ECO	Review and audit of USG Marking requirements from time to time. (Spot check.) This will ensure that "marking" procedures are in line with contract requirements.

Marking Samples

Controlled Unclassified Information (CUI) Marking – Front Cover Notice:
Controlled or CUI//CATEGORIES/SUBCATEGORIES//Limited Dissemination Control Marking
Controlled Unclassified Information (CUI) Marking – Remaining Pages Notice centered in header and footer:
CUI – Contract Number

Signature

Print Name:	Barbara A. Cole
Title:	Associate Vice President for Research Administration
	<i>10.23.19</i>
Signature	Date

History

Effective Date	Revision Date	Authors	Description
2019-Oct 23	N/A	William J. Collins	Establish a standard operating procedure for "Controlled Unclassified Information (CUI)" documents, presentations, software simulations and technical data that contain required contract language for "deliverables" to be "marked with a suitable notice or legend".

Point of Contact Numbers

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