



# USG TECHNICAL DATA MARKING FUNDAMENTAL RESEARCH 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 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 - "Fundamental Research" 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. This 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 FUNDAMENTAL RESEARCH 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 Fundamental Research notice on front cover in a font size that is readable when printed. Include the Contract Number in the header or footer.
4	PI	Insert in the remaining pages: "Fundamental Research" and the Contract number into the center of the header or 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

Fundamental Research Marking – Front Cover Notice:
<b>Fundamental Research:</b>
The presentations/reports are not "subject" to the EAR – Fundamental Research as per EAR Part 734.8 (a) and (c).
Fundamental Research Marking – Remaining Pages Notice centered in header or footer:
<b>Fundamental Research (FR) – Contract Number</b>

### Signature

Print Name:	Barbara A. Cole
Title:	Associate Vice President for Research Administration
	<i>10.23.2019</i>
Signature	Date

### History

Effective Date	Revision Date	Authors	Description
2019-Oct 23	N/A	William J. Collins	Establish a standard operating procedure for "Fundamental Research" 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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Director of Export Control Compliance	305-284-9558