Periodically throughout the course of the research, the PI and key personnel on the project should review the procedures, terms and direction of the research to verify that they remain in compliance with the Export Control Laws. The PI should consider the following questions:

1. Has the sponsor issued a modification to the terms and conditions of the award that affect publication of the research results?

2. Has the sponsor issued a modification to the terms and conditions of the award that affect the involvement of foreign nations to the project?

3. Has the research project evolved to now include technology or devices for use in military, security or intelligence activities?

4. Are there currently foreign nationals working on the research project?

5. Have any new members joined the research team since the initial TCP was prepared who have not provided proof of US citizenship or legal resident alien status?

6. Is any member of the research team collaborating with a foreign colleague in a foreign country?

7. Has any member of the research team travelled to a foreign country since the research activities began?

8. Are laptops, cell phones, or global positioning systems being used by any member of the research team specifically for this project?

9. Has encrypted technology been newly introduced to the project since the development of the TCP?

10. Has any research related technology or data been emailed or shipped outside of the United States?

11. Is the research being conducted in a space which is accessible by anyone other than a member of the research team?

12. Has the research team deviated from the procedures outlined in the original TCP prepared for this project?

13. Does the current TCP adequately protect the research team members and the university from a violation of the federal export control regulations?

If the answer to any of the above questions is “yes,” either the TCP needs to be revised or a license is required from the appropriate federal agency. In either event, please secure all research materials, cease research activity and contact the GVSU’s Export Control Official at exportcontrols@gvsu.edu for further guidance.