



Export Control Awareness Training EC100

Sandia National Laboratories
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Introduction

Welcome to Export Control Awareness Training (EC100)

The purpose of this training is to provide you with a basic awareness of export controls. After completing this course, you should have a basic knowledge of what export controls are, why they are important, and how they apply to you. This training is not intended to make you an expert on export controls. But employees and contractors who work for Sandia are expected to be aware of the existence of export controls and to know when a work situation poses export-control considerations.

Why Comply?

Employees or contractors who have any association with foreign nationals, or transfer property outside the United States, or even to another entity inside the United States, must be familiar with this training material.

Sandia is committed to a policy of adherence to all US export control laws and regulations. The export of commodities, technology, software, or information must be

accomplished in accordance with export control requirements.

Penalties for failure to comply with export regulations are severe. You may be fined up to \$250,000 and/or imprisoned for up to ten years. Sandia can be fined the greater of \$1 million or five times the value of the export. Sandia can be denied export privileges, that would severely hinder our ability to accomplish our mission. Finally, DOE is concerned that we avoid any public and political embarrassment for export control violations.

Successful completion of this training will help you be more aware of export control concerns and increase your ability to comply with all applicable laws and regulations.

Course Description

Audience All employees and contractors that are exposed to international transactions are required to complete Export Control Awareness Training (EC100).

Goal To increase employee awareness and compliance with existing export control laws and regulations.

Objectives When you have completed EC100, you will be able to:

- Identify why export controls are important, when export controls apply, and whom to contact for assistance.
- Identify commodities, technologies or software programs that may be sensitive and how to protect them.
- Identify your export control responsibilities when interacting with foreign nationals.
- Identify when, where, and how a "deemed export" can take place.
- Identify situations when export controls apply to meetings, conferences and symposia.
- Identify when export controls apply during foreign travel and how to avoid unauthorized release of technology.
- Determine whether responding to a request for technical information may constitute an export.
- Describe what needs to be done prior to sending commodities, technical data and software to foreign countries.

Course Credit After completing this guide (i.e. reading the modules, answering the questions, and checking your answers against the Answer Key), notify your organization's training coordinator and ask that they enter your successful completion in the Training Education & Development System (TEDS).

How to Use This Guide

This guide was created as a substitute for the online version of EC100. In order to get the most from this guide it is important to be familiar with the layout and design of the guide.

Important Points You'll find important points made throughout the guide by way of the EC100 mascot. Whenever you see the EC100 mascot you'll know to pay close attention to what is stated in italics next to him.

Glossary There is a Glossary on page 26 of this guide. Words in the Glossary will appear in bold text throughout the guide.

Questions/Answers

You will find questions at the end of each module. The answers to the questions can be found in the Answer Key on page 27.

Course Credit

After completing this guide (i.e. reading the modules, answering the questions, and checking your answers against the Answer Key), notify your organization's training coordinator and ask that they enter our successful completion in the Training Education & Development System (TEDS).

Evaluation Form

Once you have completed this course, please turn to page 31 and take a minute to complete and submit this form.

Module 1: Everyone's Export Control Responsibilities

Objective: To identify why export controls are important, when export controls apply, and whom to contact for assistance.



The very nature of Sandia's mission and work requires us to deal with export-controlled items and information.

An export is any item or information sent, carried, or transmitted outside the United States.

Export controls are critical to protecting U.S. national security and economic interests. Protecting export controlled items and information is everyone's responsibility

All personnel at Sandia are expected to:

-  Avoid the inadvertent or unauthorized release of export-controlled information;
-  Recognize that responding to a request for technical information may be an export;
-  Protect items, technologies and software that may be sensitive; and
-  Follow established procedures when sending items, technical data, or software to foreign countries.



Export controls apply to all technical information shared with a foreign person, company, or facility. Limit your interactions until you're sure it's o.k.

Before entering into any international interaction or providing **technology** to a foreign national:

-  Be aware that the topics of concern include military, nuclear, and weapons technology, as well as advanced commercial electronics;
-  Consider that any technical exchange with a **foreign national** is considered an export regardless of location or means;
-  Consult the Export Control Office for advice to determine if export licenses or other governmental approvals are required; and
-  Be prepared upon request to provide the person's name, citizenship, affiliation, and employer.



Export controls apply to all international contacts during meetings, conferences, presentations, and travel.

Before giving a technical presentation:

-  Contact the Export Office or the Classification and Information Security Office for review and approval requirements; and
-  Assume foreign persons could be present.

Before traveling internationally, realize export controls apply no matter:

-  Who you are
-  Where you're going
-  Why you're traveling, or
-  What you're taking with you.



Export controls apply to all responses to international requests, whether for information or items.

Before responding to a request for technical information:

-  Know your customer and why they want the information;
-  Recognize export control **red flags** and how to deal with them;
-  Report unusual requests to the Export Control Office;
-  Consult with the Export Control Office to determine whether export controls apply; and
-  Note that Export Controls do not apply to **fundamental research** or **public domain** information.

Before shipping or mailing an item to any international location:

-  Plan ahead! Realize that export licensing and other written approvals take time; and
-  Process items through the Mail Center, the Shipping Department, or the Export Control Office.

Module 1: Questions

Q1: What are all Sandia personnel expected to be aware of?

- A. Whom to contact for assistance with export controls.
- B. That export controls don't apply to Sandia.
- C. Why export controls are not so important.
- D. Whom to contact to avoid export controls.

- Q2: When should you consult the Export Control Office?
- A. Before entering into any international interaction.
 - B. After sending technical data overseas.
 - C. Prior to discussing your project with a foreign national.
 - D. A and C.



High-risk property protection is another example of an export-controlled topic of concern.

Module 2: Topics of Concern

Objective: Identify commodities, technologies or software programs that may be sensitive and how to protect them.



Consult the Export Control Office to identify any export-related issues prior to entering into any international transaction.

The Export Control Office can help you identify any topics of concern. Their resources include DOE's **sensitive subject list**, which outlines export-controlled information whose transfer to foreign nationals may raise national security, nuclear proliferation, and other export control concerns. This list, in part, is a compilation of other government agencies' published lists including the Commerce Department's **Commerce Control List** and the State Department's **United States Munitions List**. For a complete text of these lists, contact the Export Control Office.



Familiarize yourself with sensitive topic categories, so you can help maintain appropriate export controls.

Examples of sensitive topics are:



- Military weapons, their design and delivery systems;
- Nuclear devices and components; and
- Advanced technologies and applications that may have both commercial and military use.

You are not required to be an expert in all sensitive topics - that is the responsibility of the Export Control Office and the Classification and Information Security Office. Contact either office if you have doubts.

By knowing categories of topics as they pertain to your work, you can avoid violating export control regulations, and the serious penalties that may result.



Remember - National Laboratories may produce technologies not yet defined as export-controlled.

Emerging technologies and recent scientific breakthroughs may not appear on published export controls lists.

Advances in research could shift your technology from public domain into export-controlled status. Awareness of export controls and topics of concern is critical to a technology's proper protection.

The release of **high-risk property** and material causes export control concerns because these items may be used for nuclear proliferation and may pose a threat to national security. The disposal, reapplication, donation and sale of excess or obsolete property present some challenges related to export control.



High-risk property has specific disposal requirements.

A thorough review of export control regulations must precede the sale or donation of high-risk items to ensure they do not pose export control risks. A background check of the recipient is performed to avoid potential improper transfer of title.

Property Management reviews and determines if your item is considered high-risk property and the proper disposal method.

Module 2: Questions

Q1: Examples of sensitive subjects include:

- A. Solar energy conversion.
- B. Applied mathematics.
- C. Military technologies.
- D. Commercial seismic sensors.

Q2: Export control issues involving high-risk property are best addressed when?

- A. Only when you know you are selling something to another country.
- B. Before you sell, donate, or dispose of an export-controlled or high-risk item.
- C. During an audit by the Department of Commerce or Department of State.
- D. When you see it on the front page of the local newspaper.

Module 3: Interacting with Foreign Nationals

Objective: Identify your export control responsibilities when interacting with foreign nationals.



Applying export controls to interactions with foreign nationals helps protect national interests.

Examples of interactions include hosting a foreign visitor, attending a conference or meeting, foreign travel, or responding to a solicitation for information.

It is imperative that controlled information released to a foreign national not exceed what is approved.



Interactions with foreign nationals are potential export situations.

Interactions with **non-U.S. persons** can take on many forms, including hosting a visitor, hiring a consultant, giving a facility tour, or talking with a foreign national. Each of these scenarios poses an opportunity for an export situation to arise, if unauthorized **technology** transfers or discussions take place. The technology can be released through discussions, presentations or reports, e-mail, or other electronic media.

Technology shared with a foreign person is deemed to have been exported to his or her home country, even if the individual remains in the United States. An export license may be required unless the information is considered **fundamental research** or is in the **public domain**.



Be sure to verify an individual's name and professional affiliation to ensure they're not prohibited from entering into export controlled activities.

The U.S. Departments of Commerce, Treasury and State each have identified specific persons, companies and facilities that are legally barred from export activity or require special approvals. The Export Control Office can check these lists from you. Limit your interactions until you're sure it's okay.



Before sharing technical data with a foreign national, contact the Export Control Office.

Prior to entering into a technical interaction with a foreign national, check whether export licenses or other governmental approvals are required.

Besides being concerned with who you are dealing with, remember that certain technologies require licensing or other governmental approval for their release. Contact the Export Control Office for assistance in making that determination.

Module 3: Questions

Q1: You have invited a group of foreign investors to go on a tour of your facility. Is this a potential export situation?

- A. Yes, because any interaction with foreign persons is a potential export situation.
- B. No, because investors are just touring and are not subject to export controls.

- C. No, because if they don't get the tour, they won't fund the project.
- D. Yes, because their investment will be in foreign currency.

Q2: Which of the following does NOT represent potential export control concerns when dealing with foreign persons?

- A. Giving a tour of a research facility.
- B. Hiring a foreign person to work at your facility.
- C. Discussing technical information over dinner.
- D. Sharing personal stories with a friend.

Module 4: Deemed Exports

Objective: Identify when, where, and how a "deemed export" can take place.



"Deemed export" refers to the release of technology to a foreign national while in the United States...

"**Deemed export**" is a term used by the Department of Commerce to highlight the language contained in its regulations. These types of exports involve a release of technology to a foreign national in the United States or its **possessions**, through visual inspection or oral exchange.

It can also take place by practice or application under special guidance of persons with detailed knowledge of the technology or software. If an export of this technology would normally require licensing to the foreign national's home country, then the "deemed export" also requires an export license.



The "deemed export" rule applies to all non-U.S. citizens.

A deemed export can involve DOE employees, visitors to DOE sites, contract employees, U.S. university faculty and students, and industrial partners.

Identify in advance any potential export control situations that can be addressed through a careful review of the nature of an assignment, visit, or interchange. Take into account the citizenship, affiliation, and employer of the visitor receiving the information.



"Deemed exports" and other transfers of technology differ from physical exports.

Physical exports require the departure of a commodity, software, or technology from United States soil to a foreign country.

A "deemed export" is the transfer of intellectual property to a foreign national within the United States.



There are numerous situations that can cause a "deemed export."

Examples of ways that "deemed exports" can occur include:

-  Unauthorized publications of technical documents (e.g., websites);
-  Technical presentations or discussions;
-  Reports, detailed guidance, or comments;
-  Access to export-controlled items or software source code; and
-  Facility tours.

Module 4: Questions

Q1: Which of the following is a "deemed export" when dealing with a foreign national in the U.S.

- A. Shipping internationally.
- B. Giving detailed guidance.
- C. Publishing a paper.
- D. Giving a public presentation.

Q2: What should you do when a foreign national proposes to bring new technology into the U.S. and work for you to finish its development?

- A. Accept the offer and proceed without any delay.
- B. Contact the Export Control Office for advice and guidance.
- C. Forget about the offer because it will take more of your time.
- D. Plan to work closely with the individual because it will help your research.

Module 5: Conferences and Symposia

Objective: Identify situations when export controls apply to meetings, conferences and symposia.



Assume all conferences you attend or sponsor could have foreign nationals present.

Unless you can verify that all attendees are **U.S. persons**, expect representation from foreign countries at all conferences. Special precautions must be taken to prevent a release of information to **foreign nationals**.

Be aware that any conversation including technical information with a foreign national is considered to be an export to their country, regardless of how and where you interact. You are not "exporting" unless you provide information or comments to a foreign national.

If you are sponsoring the conference, you must be aware of the potential for an export to take place and take precautions accordingly. This may include recommending a preliminary export control review of the presentations in

order to preclude a potentially unauthorized release of controlled information or technology.



Information in the public domain is not subject to export controls.

Care should be taken to ensure that the information you intend to convey is considered to be **fundamental research** or to be in the **public domain**.

Before an **open meeting**, regardless of location, all papers or presentations should be carefully reviewed and approved. This will help ensure they do not convey sensitive or **export-controlled information**.



A significant breakthrough may change the status of your work from fundamental research to export controlled.

If during the course of your research, you achieve a breakthrough that you consider significant, this event may change the way export controls apply. This advancement in science may re-define your research so that it is no longer considered fundamental. Be aware that sharing this news at a conference might be an export.



Do not indiscriminately release information that is sensitive or export-controlled to the public.

If you are unsure whether a subject warrants protection, contact the Export Control Office or the Classification and Information Security Office for guidance. They will review the topic against various regulations, make a determination, and advise you how to proceed.

Module 5: Questions

Q1: You've been invited to lecture in England, regarding your recent scientific breakthrough. What do you need to do to avoid export control problems?

- A. Go ahead and make travel arrangements without hesitation once your management has approved the trip.
- B. Have your breakthrough reviewed and approved to determine any export control concerns.
- C. To avoid export controls, decline the travel but offer to share your findings via videoconferencing.
- D. None of the above.

Q2: You've been invited to comment on a technical article authored by a foreign colleague at a conference being held at the local convention center. Are there any export control issues?

- A. No, because the conference is being held locally.
- B. Yes, because the author is not a U.S. person.
- C. Yes, because your comments may contain export controlled information.

D. No, because the article is in a foreign journal.

Module 6: Foreign Travel

Objective: Identify when export controls apply during foreign travel and how to avoid unauthorized release of technology.



No matter where international travel takes you, export controls apply.

International travel provides the potential for a release of technology. Export controls must always be considered when traveling outside of the United States. Your destination does not matter.

Export control policies and licensing requirements apply to all countries. "**Sensitive countries**" are identified because of U.S. Government concerns. Even Canada, England, and other countries considered "friendly" to the United States may require special approval for the transfer of certain technologies.



No matter who you are in an export control situation, the regulations apply to you.

Export controls apply to all **U.S. persons** on foreign travel. This includes all DOE employees, Sandia employees, and contract associates, as well as our U.S. industry partners and their employees. There are no exceptions to the applicability of these laws and regulations.



No matter why you're traveling internationally, export controls still apply to you.

Export controls apply to any foreign travel, regardless of the nature of the trip. In addition to being subject to the laws of the country you are visiting, U.S. export control laws still apply.

If your foreign travel is business related, such as giving a presentation, a formal review and approval of the proposed content, actions and discussions are required before the trip. This will help ensure no unauthorized release of controlled information takes place. In addition, submitting a formal trip report may identify potential export violations. Unless your content falls into the **public domain**, such as a previously published article, an unauthorized export control situation may arise.



No matter what it is you're taking internationally with you, export controls will apply.

Export controls are applicable to all commodities, technology and software. This includes proprietary information or information shared in confidence, not in the public domain.

Approval by the Export Control Office is required, whether you hand-carry property with the intention of leaving it there or bringing it back. This includes personal electronics such as laptop computers and digital cameras. Encryption technologies of certain key lengths are currently controlled to specific countries. These controls are changing rapidly, but release of this type of technology may require special approvals. In some cases, an export license may be required before your departure. The Property Management User's Manual also requires this review.

Even though you may be compliant with U.S. export regulations, be aware that there are import laws in your destination country. Even short visits can turn into long ones if you're detained for violating their import regulations!

Temporary exports are subject to U.S. Customs review upon their return. Following proper export procedures prior to departure may facilitate the U.S. Customs clearance process.

Module 6: Questions

Q1: Why do you need to document handcarrying your laptop or other electronics to a foreign country?

- A. Bringing the goods back into the U.S. will be easier.
- B. There is no need to document handcarried items.
- C. Property Management User's Manual requires it.
- D. A and C.

Q2: You are a sub-contractor going on personal foreign travel. Do export controls apply to you?

- A. No, because you're not traveling on business.
- B. Yes, the nature of the trip doesn't matter.
- C. No, export controls only apply to government employees.
- D. None of the above.

Module 7: Responding to Solicitation of Information

Objective: Determine whether responding to a request for technical information may constitute an export.



The very nature of our work makes us a source of export-controlled information.

As a world-renowned repository for dynamic, cutting edge technology, the DOE laboratory complex is a regular recipient of requests for technical information. These requests may appear to come from the United States but can, in fact, be foreign in origin. Many are simple e-mails.

Care must be exercised when responding to such inquiries, as the reply may contain export-controlled information that

may require an export license or other special approval. The reply may take the form of **technical data**.



Use caution when deciding whether to respond to a request for information.

Information found in the **public domain** or that is considered **fundamental research** is of no concern. Acknowledge the request and reply that a detailed response may require special approvals.

If the information requested is highly technical, or you know it is controlled, do not transmit a response. Someone may be attempting to gain economic or military advantage over the United States.



Be careful if you decide to release technical information.

You need to take precautions in order to help maintain appropriate export controls. In addition, follow these recommended guidelines prior to providing information.

-  Verify the requestor's identity;
-  Confirm the requestor has a legitimate reason for the request; and
-  Document your justification for responding to the request.

By asking questions before you act, you can avoid the negative consequences of embarrassment, fines, or prosecution later.



Report any unusual requests or other red flags to the Export Control Office.

If there is no apparent connection between the individual or organization and the topic of the request, consult the Export Control Office for assistance in determining the proper response. Other examples of **red flags** include:

-  Evasiveness or reluctance to offer information;
-  A willingness to pay for information;
-  Urgency, or repeated requests; or
-  Anxiety or anger in tone of request.

Module 7: Questions

Q1: An individual approaches you at a local conference stating she recognizes your name as a Sandia scientist. She begins asking detailed questions that do not relate to the conference topic. What should you do?

- A. Advise her that you may need special approvals before answering her questions.
- B. Answer all her questions to the best of your ability.
- C. Refer her to someone else in the field who has no export control awareness
- D. Do none of the above.

Q2: You receive an e-mail request from an individual who apparently works for the U.S. Department of Defense, to provide specifications for test equipment related to a weapons system you are helping to develop. What should you do?

- A. Verify the requestor's identity.
- B. Confirm the requestor has a legitimate use.
- C. Do each of these.
- D. Document your justification for responding.

Module 8: Shipping Internationally

Objective: Describe what needs to be done prior to sending commodities, technical data and software to foreign countries.



Proper exporting procedures require more than packing a box and shipping it.

Shipping an item out of the country requires appropriate documentation and approval. Each physical **export** situation is different. Export controls apply to all items being exported from the U.S., regardless of where the item was made.

Depending on what you are exporting, where it is going, and the ultimate end-use and the end-user of the item, certain approvals may be required. In some cases, an export license is required, and that can take weeks or months to receive. In most cases, written approval from the Export Control Office is sufficient.



Planning ahead is critical when shipping to foreign destinations.

Although DOE sponsors many diverse international **programs**, regulatory oversight is still needed to make sure your export is in compliance with applicable regulations.

One easy way to comply with possible restrictions is to plan your activities well in advance of any proposed shipment. Early in the life of a new program, ask the question "Will I be exporting anything there?" If the answer is potentially "yes," contact the Export Control Office to determine if special approvals or licensing is required. In order to avoid delays when your item is ready for export, make sure you have the necessary approvals beforehand.



All exports require proper documentation.

Approved recordkeeping methods help ensure compliance with applicable export controls. This even applies to commercially available products.

The Export Control Office must review your international shipping documents prior to shipment. The Shipping Department ensures all proper documents are prepared, filed, and reported to the appropriate authorities as required by law.



Do not take items directly to a shipping company or drop box.

Forward all **courier** packages to the Shipping Department. Transportation (844-8048) is available to pick up courier envelopes and deliver them to the Shipping Department. All courier packages are reviewed for content and destination prior to departure from shipping dock. This process helps ensure our continued compliance with U.S. export control regulations at a minimum of inconvenience to your program.

Module 8: Questions

Q1: You've been advised that your shipment of computer hardware requires an export license, but you need to get the items there by the end of the week. Should you go ahead and ship it out?

- A. Yes, no one will never know about it.
- B. Yes, your project will suffer if you delay.
- C. No, deadlines are unrealistic.
- D. No, hold off until you have the license.

Q2: You want to export a high-speed Japanese-made oscilloscope to Israel. Do export controls still apply?

- A. No, export controls apply only to U.S.-made products.
- B. No, high-speed oscilloscopes are available on the open market.
- C. Yes, country of manufacture doesn't matter.
- D. Yes, all items sent to Israel require export licensing.

Answer Key

Module 1:

Q1: A
Q2: D

Module 2:

Q1: C
Q2: B

Module 3:

Q1: A
Q2: D

Module 4:

Q1: B
Q2: B

Module 5:

Q1: B
Q2: C

Module 6:

Q1: D
Q2: B

Module 7:

Q1: A
Q2: C

Module 8:

Q1: D
Q2: C

Glossary

Commerce Control List	<p>A list of "dual use" export controlled items under the jurisdiction of DOC. The categories as of June 2000 are:</p> <ol style="list-style-type: none">0 -- Nuclear Material, Facilities, Equip. and Misc. Items.1 -- Materials, Chemicals, Microorganisms, Toxins2 -- Materials Processing3 -- Electronics4 -- Computers (Hardware)5, Part 1 Telecommunications5, Part 2 Information Security (includes Encryption products)6 -- Sensors and Lasers7 -- Navigations and Avionics8 -- Marine9 -- Propulsion Systems, Space Vehicles and Related Equip.
Courier	<p>(FedEx, DHL, etc.) Companies that provide full transportation functions, without accompanying attendants, offering door-to-door air service for time-sensitive documents or small packages on a same-day or next-day basis.</p>
Deemed Export	<p>Release of technology or software subject to export control regulations to a foreign national in the United States. "Such release is deemed to be an export to the home country or countries of the foreign national" and is controlled to the same level as an actual export would be if it were shipped to the person's home country. Includes "Oral or Visual Disclosure," Ref: ITAR 120.17(4) and EAR 734.2(b)(2)(ii).</p>
Export	<p>An actual shipment, transmission or transfer of items or technology, subject to regulation, out of the United States or its territories. See also Deemed Export.</p>
Export Controlled Information	<p>ECI is a category of information designed as a nonproliferation tool. ECI is defined as technical information whose export is subject to export control and whose unrestricted public dissemination could help proliferates. http://www.sandia.gov/SandiaOnly/ADC/unclass.html#Export/</p>
Foreign National	<p>Any person who is not a citizen or lawful permanent resident (a person who holds a green card) of the United States. Including permanent resident aliens and persons not claiming citizenship with any country, otherwise known as 'stateless'.</p>
Fundamental Research	<p>Basic and applied research in science and engineering the results of which are ordinarily published and shared broadly within the scientific community. Distinguished from proprietary research and from industrial development, design, production and product utilization, the results of which ordinarily are restricted for proprietary or national security reasons. 15 CFR Part 734.8 (b) through (d) and Part 734.11 of the EAR provide specific rules that are used to determine whether research in particular institutional contexts qualifies as "fundamental research."</p>
High Risk Property	<p>Property that, because of its potential impact on public health and safety, the environment, national security interests, or nuclear proliferation concerns, must be controlled and disposed of in other than the routine manner. The categories of "high risk property" are items that fall into any of the following categories as defined by the DOE Property Management Regulations: Especially designed or prepared property Nuclear weapon components or weapon-like components Proliferation-sensitive property Export controlled items. Note: At SNL, high risk property does not include items that are export controlled only for anti-terrorism (AT) or that are designated EAR99. For example, certain equipment may or may not be designated high risk property. A Tektronix Oscilloscope, Model R7912, turned in to property reapplication for disposition, has an Export Control Classification Number (ECCN) of 3A292, is considered high risk property which will not be released for disposition and will be destroyed. However, another Tektronix Oscilloscope, Model 7603, with an ECCN of 3A992 which is export controlled for AT, and a Hewlett Packard Digitizer, Model 9874A, with an ECCN of EAR99, both turned in to property reapplication for disposition, are not considered high risk property and both will be released for disposition.</p>
Non-U.S. Person	<p>A foreign National. A person that is not a citizen of the United States or a Permanent Resident Alien (green card holder).</p>
Open Meeting	<p>A conference or gathering is "open" if all technically qualified members of the public are eligible to attend and attendees are permitted to take notes or otherwise make a personal record (not necessarily a recording) of the proceedings and presentations, Ref: BXA 734.(4)(i).</p>
Possessions	<p>Possessions of the United States include the District of Columbia, Puerto Rico and the Northern Mariana Islands (Guam).</p>
Public Domain	<p>Information which is published and which is generally accessible or available to the public, Ref. 120.7 ITAR. It does not include any technical embellishment, enhancement, explanation or interpretation which in itself is not public information, Ref: 10 CFR 810.3. See also Publicly Available Information.</p>

Publicly Available Information	Information which is published and is generally available to the public through: Sales at newsstands, bookstores, or unrestricted subscriptions; U.S. government second class mailing privileges; public libraries; patent information available at any patent office; unlimited distribution at conferences, meetings seminars, tradeshows, or exhibitions in the U.S. which are generally accessible to the public; and public release (unlimited distribution) in any form (not limited to published form) after approval by the cognizant U.S. Government department or agency.
Red Flags	Reluctance to offer information regarding end-use Willing to pay for information Requestor and type of information incompatible Requestor is evasive or unclear when questioned Requestor states past difficulty in obtaining similar information from other sources Repeated requests for denied information Anxiety or anger in tone of request or threats
Sensitive Countries	See: http://www-irm.sandia.gov/iss/depts/fio/forint-countries.htm For the sensitive countries list.
Sensitive Subject List	A list of export controlled items and technologies created by DOE used to evaluate foreign visits and assignment. It is a selection of EAR and ITAR categories applicable to the DOE complex. Examples include: nuclear weapons, missile systems, chemical & biological weapons, and radiation-hardened components.
Technical Data	For "dual use" items, things such as blueprints, plans, diagrams, models, formulae, tables engineering designs and specifications, manuals and instructions written or recorded on other media or devices such as disk, tape, read-only memories. For Military type items it includes: Blueprints, drawings, photographs, plans, instructions and documentation. Includes: Classified information relating to defense articles and defense services. Includes: Software directly related to defense articles. Does not include: Information concerning general scientific, mathematical or engineering principles commonly taught in schools colleges and universities or information in the public domain. Does not include: Basic marketing information on function or purpose or general system descriptions of defense articles.
Technology	For "dual use" items it means specific information necessary for the "development," "production," or "use" of a product. For military items it is information required for the design, development, production, manufacture, assembly, operation, repair, testing, maintenance or modification of defense articles. The information takes the form of "technical data" or "technical assistance."
U.S. Munitions List	Categories include: I. Firearms II. Artillery Projectors III. Ammunition IV. Launch Vehicles, Guided Missiles, Ballistic Missiles, Rockets, Torpedoes, Bombs and Mines V. Explosives, Propellants, Incendiary Agents, and Their Constituents VI. Vessels of War and Special Naval Equipment VII. Tanks and Military Vehicles VIII. Aircraft and Associated Equipment IX. Military Training Equipment X. Protective Personnel Equipment XI. Military Electronics XII. Fire Control, Range Finder, Optical and Guidance and Control Equipment XIII. Auxiliary Military Equipment XIV. Toxicological Agents and Equipment and Radiological Equipment XV. Space Systems and Associated Equipment XVI. Nuclear Weapons Design and Test Equipment XVII. Classified Articles, Technical Data and Defense Services Note Otherwise Enumerated XX. Submersible Vessels, Oceanographic and associated Equipment XXI. Miscellaneous Articles
U.S Persons	Ref: 22 CFR 121.1-.36 A person who is lawful permanent resident as defined by 8 U.S.C. 1101(a)(20) or who is protected individual as defined by 8 U.S.C. 1324b(a)(3). It also means any corporation, business association, partnership, society, trust, or any other entity, organization or group that is incorporated to do business in the United States. It also includes any U.S. governmental (federal, state or local) entity.

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References

Export Control Homepage

<http://www-irm.sandia.gov/organization/div10000/dpt10001/hompage/export/main.html>

Export Control Awareness Training (EC100)

https://www.prod.sandia.gov/corp_training/ec100/homepage/ec100.htm

Other related sites at Sandia:

Classification and Information Security

<http://www.sandia.gov/SandiaOnly/ADC/handbook/class/ucieci.htm>

Foreign Interactions

<http://www-irm.sandia.gov/iss/depts/fio/>

Material Protection Control and Accountability (MPC&A) Export Control Program

http://www.csu821.sandia.gov/organization/org5800/5800home/FSU_MPCA/export/exprocess.htm

Government Agencies Websites:

Department of Commerce Bureau of Export Administration

<http://www.bxa.doc.gov/>

Department of State, Office of Defense Trade Controls (DTC)

<http://www.pmdtc.org/>

Department of Energy, Nuclear Transfer and Supplier Policy Division (NN-43)

<http://www.nn.doe.gov/nn40homp3.htm>

Department of Treasury, Office of Foreign Asset Control

<http://www.treas.gov/ofac>

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Congratulations, by reading the material and answering the questions in the course modules, you've completed your required Export Control Awareness Training (EC100). In order to receive credit for EC100, you must notify your organization's training coordinator and ask that they enter your successful completion in the Training, Education & Development System (TEDS). We need your feedback to gauge the effectiveness of these materials. Please rate each item below by placing a checkmark in the box that corresponds with your rating.

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