

SPO UPDATE

Revised IUT process

Foreign National Access under DOE Order 142.3A

Angela Ford
Associate Director, SPO

RAC Forum
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What are IUTs?

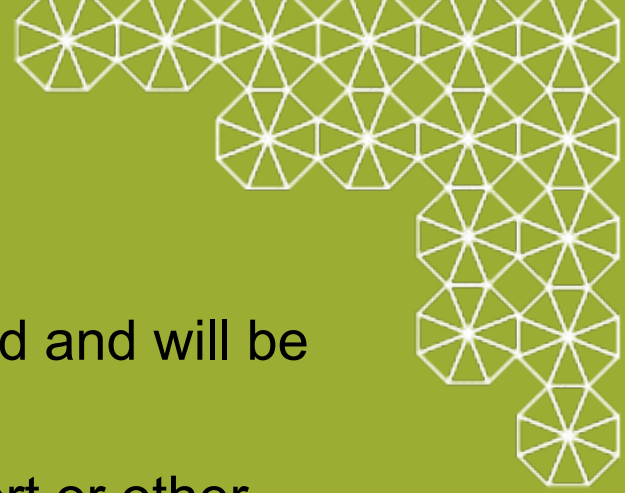
- Intra-University Transaction Agreement
- IUTs are the agreement mechanism for sending funds from LBNL to UC campuses



Why is the process being revised?

- DOE has revised or developed new policy that has brought new compliance requirements to our agreements.
- We are seeing terms added to research IUTs that must be managed by CGOs.

Revised IUT process



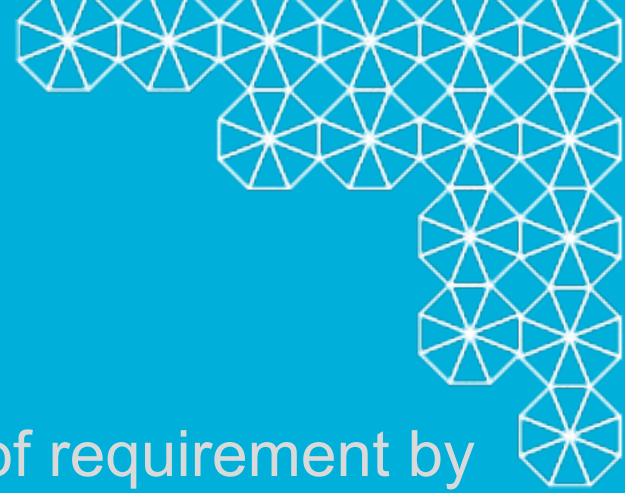
- All **research** IUTs - Require a Phoebe record and will be handled by CGOs
- Other IUTs (for shared labor, supporting effort or other goods or services) valued over \$10,000 - SPO Analyst, Glenn Chen
- Any non-research IUT valued at \$10,000 or less - Department
- Transition - Through Dec 31, 2020, research IUTs without a Phoebe proposals record will not be considered after-the-fact. CGOs will request a Phoebe proposal record.

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- Revised in December 2019
- Applicable to all DOE offices & DOE National Labs
- Removes exemption to Institutions of Higher Education
- Requires prior DOE approval of Foreign Nationals who have access to DOE sites, information, technologies, and equipment
- Potential for conflict with UC policies on non-discrimination and publication restrictions

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- At proposal stage - SPO will notify PI of requirement by providing a review comment
- At award stage - SPO will explain the requirement to the PI and request informed consent
- Notify SPO if your PI or research team receives a request for citizenship or nationality information from DOE/DOE Lab
- SPO will work with the PI and Export Control Officer on any requests for information from DOE