

Standard Operating Procedure (SOP) Protecting Research in the University of Arizona Applied Research Building (ARB)

Effective Standard Date: October 25, 2023

Purpose of Document:

The objective of this Standard Operating Procedure (SOP) is to implement and uphold comprehensive building access control protocols to ensure compliance with export control regulations, including but not limited to the handling of Controlled Unclassified Information (CUI), the International Traffic in Arms Regulations (ITAR), and the Export Administration Regulations (EAR), within the Arizona Space Institute's Applied Research Building (ARB).

Office/department responsible: Arizona Space Institute, Facilities

Overview:

The ARB provides regionally unique capabilities for the University of Arizona while consolidating several strategic cross-campus interdisciplinary programs in one location to meet current and future research needs. The ARB supports the University's Strategic Plan by focusing on applied research programs. The building is comprised of a mix of space types, including a large-scale thermal vacuum chamber, high bay payload assembly areas, varying types of laboratories, clean rooms, research offices, collaboration spaces, and conference rooms. The ARB is home to strategic research that advances space exploration and applied physical sciences and engineering. Many projects involve restricted research such as (ITAR/EAR) and Controlled Unclassified Information (CUI).

Scope:

This SOP provides basic security protocols for all individuals, including employees, contractors, visitors, and any other personnel accessing the ARB facilities. It is the responsibility of all personnel to adhere to the access control measures outlined in this document. This guidance will also help secure and protect restricted items (i.e., data, equipment, materials, substances, and software). This SOP augments existing Technology Control Plans and does not supersede any existing TCPs (Technology Control Plans).

Contacts

Responsible University Official: Director – Arizona Space Institute

Responsible University Facilities Official: Director, Operations & Facilities – Arizona Space Institute

Responsible University Office: Arizona Space Institute, Facilities

If there are questions on this procedure, you may send an e-mail to ASI-Facilities@arizona.edu

Web Address for this Policy

https://space.arizona.edu/resources/asi-facilities

Definitions

Term	Definition as it relates to this standard	
The Applied Research Building (ARB)	A University of Arizona Research Facility managed by the	
	Arizona Space Institute.	
Standard Operating Procedure	A standard operating procedure is a set of step-by-step	
	instructions compiled by an organization to help workers	
	carry out routine operations.	
Technology Control Plan (TCP)	A Technology Control Plan (TCP) is a living document	
	that outlines the means in which export controlled	
	information and technology will be protected.	
International Traffic in Arms Regulations (ITAR)	The U.S. Department of State regulates the export of	
	defense and military related technologies to safeguard U.S.	
	national security and further U.S. foreign policy	
	objectives.	
Controlled Unclassified Information (CUI)	Controlled Unclassified Information (CUI) is information	
	that requires safeguarding or dissemination controls	
	pursuant to and consistent with applicable law,	
	regulations, and government-wide policies but is not	
	classified. CUI is regulated by the NARA (National	
	Archives and Records Administration)	
Export Administration Regulations (EAR)	A set of United States export guidelines and prohibitions.	
	The U. S. Department of Commerce regulates export and	
	export restrictions.	
Export Controls	Regulations governing the export of controlled	
	technologies, information, and equipment. Including	
	but not limited to ITAR, and EAR.	
Authorized Personnel	Individuals granted permission to access ARB facilities	
	and authorized to access controlled items.	

Access Control Procedures:

1. Access Authorization:

1.1. Access to the ARB facility is restricted to authorized personnel only. All individuals requesting access must complete an access request form, providing appropriate identification and documentation.

- 1.2. Access requests must be submitted to ARB Facilities at least five (5) business days before the requested access date.
- 1.3. ARB Facilities will review and verify access requests with authorized principal investigators for accuracy.
- 1.4 All approved requestors (U.S. persons and non-U. S. persons) are required to sign a Non-disclosure Agreement (NDA)
- 1.5. Upon approval, authorized personnel will be issued a unique access card which must be displayed while inside the ARB facility.

2. Entry Control:

- 2.1. All personnel entering the ARB facility must present their authorized access card (Cat-Card) or Visitor badge to the designated access control point.
- 2.2. Access control points may include electronic card readers, or security personnel stationed at the entrance.
- 2.3. Visitors and contractors without an access card or badge must be escorted by authorized personnel while inside the facility.
- 2.4. Tailgating or piggybacking into secure areas is not allowed. If you do not know someone do not hold the door for them.
- 2.5. Doors should never be propped open for extended periods of time. If propping a door for any reason (deliveries etc.) it should never be left unattended.

3. Visitor Access:

- 3.1. Visitors requesting access to the ARB facility must be pre-approved and accompanied by an authorized ARB employee or host.
- 3.2. The host is responsible for ensuring the visitor's compliance with export control regulations during their visit.
- 3.3. Visitors must sign in and out at the ARB Front Desk, providing their name, affiliation, and purpose of the visit.

4. Secure Areas:

- 4.1. The ARB facility may contain secure areas designated for the handling of export-controlled items, export-controlled information, and CUI data.
- 4.2. Access to secure areas is restricted to authorized personnel with the appropriate security clearance.
- 4.3. Secure areas must be locked when not in use, and access must be strictly controlled.

5. Reporting and Compliance:

- 5.1. Any security breaches or incidents must be immediately reported to the ARB Facility Management.
- 5.2. All personnel accessing the ARB facility are responsible for their actions and for ensuring they do not violate export control regulations.
- 5.3 ARB authorized personnel can report violations to the terms of this building security SOP or the ARB's NDA to the Ethics Hotline at 866-364-1908

Training and Awareness:

All authorized personnel must take export control training as part of their orientation. Regular training reminders and updates on security protocols and compliance will be provided by UASI (University of Arizona Space Institute) when necessary. See the Export Control Training - Edge Learning

Enforcement:

Failure to comply with this SOP or any export control regulations may result in disciplinary action including, but not limited to, access revocation, legal action, and termination of employment or contract.

Revision and Review:

This SOP will be reviewed annually and updated as necessary to ensure compliance with the latest export control regulations.

Approval:

This standard was approved by the ASI Director and is effective as of the date above.

History/Revision Dates

Effective	Version #	Author	Description
Date			
October 25, 2023	1.0	Mark Matusko	Initial version.

Next Review Date: 10/25/2024