Research and the Graduate School
UNIVERSITY of ALASKA ANCHORAGE

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Controlled Unclassified Information (CUI) Management and Protection Policy

Policy Statement

CUI is federal non-classified information the U.S. Government creates or possesses, or that a non-federal entity receives, possesses, or creates for, or on behalf of, the U.S Government, that requires information security controls to safeguard or disseminate. Certain agencies use the terms Sensitive (non-classified) information, For Office Use Only, and Official Use Only to designate and mark CUI.

A research project at UAA may require the implementation of CUI information security controls when the federal contract/award contains language/clauses (e.g., FAR, DFARS) requiring those controls and/or the information or technology is export controlled

The information security controls must be compliant with the federal regulations specified in 32 CFR Part 2002 and NIST SP 800-171r2.

Usually Non-U.S. persons are not allowed access to CUI unless the sponsor has agreed to grant access to a Non-U.S. person under a fully executed non-disclosure agreement (NDA) and/or export control license has been received.

CUI Management and researcher responsibilities

The UAA Vice Provost for Research (VPR) is responsible to ensure there is a common approach to national security issues common to CUI and innovation, IP creation, and commercialization. The VPR is responsible for helping UAA faculty, students, and staff with the security measures necessary to safeguard controlled unclassified information to include export-controlled, for official use only (FOUO) and sensitive but unclassified information (SUI).
The UAA faculty, staff, and students where applicable (e.g., inventors) are responsible for:

1. Verifying that the research project will receive, possess, and/or create CUI by working with the VPR and the Office of Sponsored Programs and the Office of Technology Commercialization
2. Obtaining sponsoring organization's guidance concerning access to CUI by working with the VPR and the Office of Sponsored Programs
3. Contacting the VPR if a protection/security plan (e.g. technology control plan) is required to control access to and dissemination of CUI.
4. Identifying the appropriate information security system/technology solution to use to secure and store the information.

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5. Creating the information security plan (ISP) for the research project. This plan outlines the policies and procedures the research team will follow (e.g., information access restrictions, laboratory security, etc.) to comply with the CUI requirements.
6. Obtaining approval of the ISP from the sponsoring organization by working with the VPR and the Office of Sponsored Programs.
7. Updating the ISP as contractually required and obtaining re-approval of the ISP from the sponsoring organization by working with the VPR and the Office of Sponsored Programs.

Definitions

Controlled Unclassified Information (CUI) is information that laws, regulations, or Government-wide policies require to have safeguarding or dissemination controls, excluding classified information.

Defense Federal Acquisition Regulation Supplement (DFARS)
Federal Acquisition Regulation (FAR)

Currently the Federal Government recognizes over one hundred and thirty categories of CUI organized in the following groups: Critical Infrastructure, Defense, Export Control, Financial, Immigration, Intelligence, International Agreements, Law Enforcement, Legal, Natural and Cultural Resources, North Atlantic Treaty Organization, Nuclear, Patent, Privacy, Procurement and Acquisition, Proprietary Business Information, Provisional, Statistical, Tax, Transportation[1].

Approved by Chancellor Cathy Sandeen, PhD on 2/11/2019

[1] For CUI Categories and Subcategories please go to the US National Archives Category List.