

# ITAR & USML Introduction (Module A)

## 1. ITAR OVERVIEW

In this section we will review the history of the AECA, how the USML is defined and specific concepts including controlled articles and U.S. Person vs. Foreign Person.

## 2. ITAR RAMIFICATIONS

Control procedures such as how defense classified articles should be controlled, technical data handling and procedures for retransfers.

## 3. EXPORTS

Here we will discuss how technical data is defined, how a deemed export may occur, how the ITAR applies to services and products as well as prohibited parties. In addition the methods for DDTC enforcement of the regulations will be reviewed.

## 4. IMPORTS

Imports can impact how a company operates when applied to restricted defense articles being imported or re-imported. Notice to U.S. Partners of shipments will be discussed.

## 5. PENALTIES

Application of regulatory and criminal penalties on individuals (employees), company, customers and vendors will be reviewed.

## 6. ROLE AND RESPONSIBILITY

In this section the role of the company, employee, classification specialist and the escalation team will be reviewed along with the responsibility of each.

## 7. QUIZ

Short quiz will be given on the subject of this module followed by a review with the instructor.

## 8. REVIEW

Question and answer session.

## EAR & CCL Introduction (Module B)

### 1. US COMMERCIAL EXPORT CONTROLS

Key concepts regarding the Export Administration Regulations (EAR) and how it is defined along with specific agencies control of commercial articles, U.S. Person vs. Foreign Person.

### 2. ITEMS AND PERSONS SUBJECT TO US JURISDICTION

U.S. Persons and how their interaction with controlled articles relates to foreign persons. Review of responsibilities of U.S. Persons and controls to be established to protect against accidental export (deemed export), which may necessitate making a voluntary disclosure.

### 3. US EMBARGO AND EAR SPECIAL COUNTRY CONTROLS

Relevance of current US Embargo and special country controls effects daily commerce, methods to verify customer prior to business engagement. This includes a review of the US Department of Treasury's Office of Foreign Assets Controls (OFAC) as well as US Department of Commerce's Bureau of Industry and Security (BIS) regulations and restrictions. Dealing with potential customers who are subject to restrictions as Specially Designated Nationals (SDN). Russian Sectoral Sanctions will be discussed.

### 4. ANTIBOYCOTT REGULATIONS

Introduction and review of the Office of Anti-Boycott Compliance and the relationship to the Arab League Boycott on Israel and other Boycotts. We will review the prohibitions and exceptions as well as the reporting requirements.

### 5. EXPORT ENFORCEMENT

US Marshalls, Department of Homeland Security, FBI, US Customs and Border Patrol and other agencies who may visit your company. Discussion on how they will make random visits, what you should be prepared to give them and when you should get an attorney. Prevention of violations will be reviewed with suggested action areas.

### 6. PENALTIES

Application of regulatory and criminal penalties on individuals (employees), company, customers and vendors will be reviewed.

### 7. ROLE AND RESPONSIBILITY

In this section the role of the company, employee, classification specialist and the escalation team will be reviewed along with the responsibility of each.

### 8. QUIZ

Short quiz will be given on the subject of this module followed by a review with the instructor.

### 9. REVIEW

Question and answer session.

## **USML Classification Basics (Module C)**

### **1. ITAR CLASSIFICATION AND DETERMINATION**

Using the ITAR as a guide the class will review and discuss the USML Categories and how classification processed to determine an explicit enumeration.

### **2. REVIEW INPUT DOCUMENTATION**

Review of the drawings, technical data sheets, completed customer or vendor profile forms, project check lists in order to process classification.

### **3. REVIEW USML CLASSIFICATION PROCESS**

Classification using the USML including the process and record keeping.

### **4. SPECIALLY DESIGNED**

How specially designed is applied, catch and release and how it should be documented will be reviewed.

### **5. REVIEW OF APPROVAL OPTIONS**

In this section we will review the different types of licenses, Technical Assistance Agreement (TAA), Manufacturing Assistance Agreement and Warehouse Distribution Agreement (WAA).

### **6. ROLE AND RESPONSIBILITY**

In this section the role of the company, employee, classification specialist and the escalation team will be reviewed along with the responsibility of each.

### **7. QUIZ**

Short quiz will be given on the subject of this module followed by a review with the instructor.

### **8. REVIEW**

Question and answer session.

## CCL Classification Basics (Module D)

### 1. EXPORT CLASSIFICATION AND EXPORT DETERMINATION

Using the EAR as a guide the class will review and discuss the 10 General Prohibitions, how Export Control Classification Numbers (ECCN) are formatted and organized and how to determine if the ECCN# is the correct one for an article. The Country Chart will be reviewed in order to understand controls on a specific article.

### 2. REVIEW INPUT DOCUMENTATION

Review of the drawings, technical data sheets, completed customer or vendor profile forms, project check lists in order to process classification.

### 3. SPECIALLY DESIGNED

How specially designed is applied, catch and release and how it should be documented will be reviewed.

### 4. REVIEW OF APPROVAL OPTIONS

In this section we will review the various types of licenses as well as a Deemed Export License.

### 5. ROLE AND RESPONSIBILITY

In this section the role of the company, employee, classification specialist and the escalation team will be reviewed along with the responsibility of each.

### 6. QUIZ

Short quiz will be given on the subject of this module followed by a review with the instructor.

### 7. REVIEW

Question and answer session.

## ITAR Business Simulation (Module P)

### 1. VISITOR

A visitor is coming to your facility, they are from Anguilla. How should they be processed? What preparations do you need to do to accommodate them to the facility where you are making restricted items?

### 2. NEW EMPLOYEE

How do you process this employee? What licenses and controls are required if they are not a U.S. Citizen?

### 3. NEW PROJECT - COMMERCIAL

You have an RFQ for a new project your customer wants you to build, you need to classify it and process any required licenses.

### 4. NEW PROJECT - DEFENSE

Now you have a new RFQ for project from your customer, it may require licenses before you proceed with a quote.

### 5. FOREIGN PERSON VENDOR

The requirements for your new defense project specify that you use a vendor in the United Kingdom.

### 6. ROLE AND RESPONSIBILITY

In this section the role of the company, employee, classification specialist and the escalation team will be reviewed along with the responsibility of each.

### 7. QUIZ

Short quiz will be given on the subject of this module followed by a review with the instructor.

### 8. REVIEW

Question and answer session.

## **BASICS FOR COMPLIANCE (Module Q)**

### **1. REGISTRATION**

The process of becoming registered with the DDTC will be explained along with the diligence required for the company to mitigate risk for potential violations.

### **2. WATCHLIST SCREENING**

We will review denied parties screening and the number of lists maintained by the U.S. Government, how to access them and the impact of non-compliance.

### **3. SITE SECURITY**

Visitor control is key to ensure that unescorted visitors do not become a liability requiring a deemed export violation.

### **4. CLASSIFICATION**

The US Government requires companies to self-classify their products and services. Having a process in place to ensure that this is done comprehensively and in a documented fashion is critical.

### **5. GIVING NOTICE**

What does "ITAR Restricted" mean to you? "Export Controlled" stamps on drawings and other warnings will be explained including notices outside premises.

### **6. ROLE AND RESPONSIBILITY**

In this section the role of the company, employee, classification specialist and the escalation team will be reviewed along with the responsibility of each.

### **7. QUIZ**

Short quiz will be given on the subject of this module followed by a review with the instructor.

### **8. REVIEW**

Question and answer session.