

JPL'S TRAINING PERSPECTIVE

Rachel Skinner
Office of Export Compliance
Jet Propulsion Laboratory
Rachel.A.Skinner@jpl.nasa.gov

INTRODUCTION

- The Jet Propulsion Laboratory (JPL) is a Federally Funded Research and Development Center managed by the California Institute of Technology (Caltech) for the National Aeronautics and Space Administration (NASA).
- JPL is a leading U.S. center for robotic exploration of the solar system, and conducts major programs in space-based Earth sciences and astronomy.



ORGANIZATION

- JPL's Office of Export Compliance (OEC) reports directly to the Office of the Director.
- OEC consists of:
 - Export Licensing Officers
 - Export Technical Representatives
 - Export Compliance Advisor
 - Outreach Coordinator

DEVELOPMENT OF OEC'S TRAINING PROGRAM

- OEC's training programs were developed in order to:
 - Reach out to scientific and engineering community
 - Forge partnerships with our internal customers
 - Enhance communication and understanding needs vs. wants
 - Communicate the export regulations in a proactive value added platform

ANNUAL ON-LINE EXPORT COMPLIANCE TRAINING

- OEC's annual export compliance web training program is a mandatory, continuing education course for all employees and affiliates. As administrators of the export compliance program, the OEC is required to train employees and affiliates annually, and maintain training records accordingly. This mandatory class is only available on-line.
- The module is designed to educate the JPL Community on the fundamental concepts related to export regulations. In addition to these general guidelines, our office offers in-depth, project-specific training on export regulations and restrictions.

FOCUSED TRAINING PROGRAMS

- Hosting, Hiring and Visiting Foreign Persons
- Document Review for Export Compliance
- Fundamental Research Activities
- Domestic and Foreign Travel Briefing
- Export Controlled International Shipments and Hand-Carry
- Contract Management
- Export Technical Liaison
- Limited Release System
- Record Keeping of Export Controlled Information
- Export Licensing
- New Project Briefing
- Collaborating with Foreign and Domestic Partners
- Acquisitions and Procurements
- Marking Language for Projects
- Shipping and Receiving
- Escorting Foreign Visitors

INTEGRATED TRAINING MODULE MATRIX

	All	Line Managers	Project Managers	PDMs	Cognizant Engineers	Export Technical Liaison
Annual Export Compliance Training	M	M	M	M	M	M
Document Review for Export Compliance	O	R	R	O	O	R
Export Licensing	O	R	R	O	O	R
Fundamental Research	O	R	O	O	O	O
RFPs & Bids (Acquisitions & Procurements)	O	R	R	R	R	R
Host/Hire Training Module	O	R	O	O	O	R
Record Keeping of Export Controlled Information	O	O	R	R	O	R
Collaborating with Foreign and Domestic Partners	O	R	R	O	R	R
Export Controlled International Shipments & Hand-Carry	O	R	R	O	R	R
New Project Briefing	O	R	R	O	O	R
Domestic and Foreign Travel Briefing	R	R	R	R	R	R

M - Mandatory
R - Recommended
O - Optional

INTEGRATED TRAINING MODULE MATRIX (CONT.)

	Shipping and Receiving	Office of Protective Services	Human Resources	Proposal & Portfolio Managers	Procurement	Researcher and Technologist
Annual Export Compliance Training	M	M	M	M	M	M
Document Review for Export Compliance	O	O	O	R	R	R
Export Licensing	R	O	R	R	R	O
Fundamental Research	O	O	O	R	O	R
RFPs & Bids (Acquisitions and Procurements)	O	O	O	R	R	O
Host/Hire Training Module	O	R	R	O	O	R
Record Keeping of Export Controlled Information	R	O	O	R	R	R
Collaborating with Foreign and Domestic Partners	O	O	O	R	O	R
Export Controlled International Shipments & Hand-Carry	R	O	O	R	O	R
New Project Briefing	O	O	O	R	O	R
Domestic and Foreign Travel Briefing	R	R	R	R	R	R

M - Mandatory
R - Recommended
O - Optional

DOCUMENT REVIEW FOR EXPORT COMPLIANCE COURSE

- ◉ Examines the topics related to document review of technical documents as it applies to compliance with the EAR and ITAR
- ◉ Considers such issues as the definition of “technical data” as applicable to foreign national exports, defense articles, defense services, and document review analysis
- ◉ Required for all Group Supervisors who review technical documents
- ◉ Consists of a formal lecture followed by a hands-on session of reviewing technical documents with OEC’s technical staff

DOCUMENT REVIEW FOR EXPORT COMPLIANCE COURSE (CONT.)

- Upon completion of the course, students will be prepared to:
 - Write technical documents for publication in no-license situations
 - Identify controlled technical data in documents
 - Identify defense articles and dual-use items
 - Recognize defense services and how to avoid providing defense services without a license
 - Recognize when technical activities require a license
 - Understand institutional and personal consequences of export violations

EXPORT TECHNICAL LIAISON AND LIMITED RELEASE SYSTEM COURSE

- Provides further study of the EAR and ITAR, including licensing and record keeping requirements when JPL engages with foreign persons in the U.S. or abroad
- Emphasizes that export-controlled technical data and defense services may not be provided to foreign partners, foreign persons, and U.S. universities without proper authorization

EXPORT TECHNICAL LIAISON AND LIMITED RELEASE SYSTEM COURSE (CONT.)

- ◉ The Export Technical Liaison (ETL) is the export liaison between a project, program, or task and OEC.
- ◉ A fully trained ETL is authorized to make determinations of export classification, and whether technical data is within scope of the export authority in place for their program/project/task.
- ◉ The ETL portion of the training course focuses on the roles and responsibilities of the ETL; document review; how and when to address questions from foreign partners; marking, record keeping and safeguarding requirements; and scenario Q&As.

EXPORT TECHNICAL LIAISON AND LIMITED RELEASE SYSTEM COURSE (CONT.)

- The Limited Release System (LRS) portion of the training course focuses on the LRS web tool, which aids the JPL Community in ensuring export compliance when releasing JPL scientific or technical information to industry, universities, or foreign persons that is not intended for public distribution.
- Examples of such releases include dissemination to authorized foreign partners under an export license; technical documents for procurements; subcontracts; and proposals.

EXPORT TECHNICAL LIAISON AND LIMITED RELEASE SYSTEM COURSE (CONT.)

- Upon completion of this course, students will be able to:
 - Assist OEC's Export Licensing Officers in drafting application for export authority
 - Review program/project/task documents (manuals, drawings, correspondence) to determine export classification and appropriate export marking
 - Determine if export controlled technical data is within the scope of a program/project/task export authority, such as a TAA, DSP-5, or Department of Commerce export license
 - Use LRS tool to access export documents and copies of export authority, perform the review and record determinations and rationale

CONTRACT MANAGEMENT

- JPL's Contract Administrators manage various international transactions, OEC created a specialized training program that addresses the export regulations and how they apply to:
 - NASA Task Plans
 - JPL procurement of work from Caltech
 - Caltech procurement of work from JPL
 - Fundamental research activities

LAB-WIDE PRESENTATIONS

- ◉ Export compliance training has been integrated into many classes held on the laboratory
 - Project Manager Workshop
 - University Subcontracts Workshop
 - Task Managers Workshop
- ◉ Export compliance working groups have been born from OEC's Lab-wide presentations
 - Contract Management and OEC
 - Research Network and OEC

TECHNOLOGY TRANSFER CONTROL PLAN (TTCP) BRIEFINGS

- Once a Technical Assistance Agreement (TAA) is approved, A TTCP is created to safeguard export controlled technical data. OEC briefs the program/project/task on the scope of the TAA and the provisos issued by the State Department.

CONTACT INFORMATION

Rachel Skinner

Phone) 818-354-5658

Cell) 626-319-2631

Email) Rachel.A.Skinner@jpl.nasa.gov