

Procedures Checklist

Export Compliance Program		Yes	No	Comments
1.	Is there a written export compliance manual or its equivalent?			
2.	Is it complete and up-to-date?			
3.	Do procedures contain:			
	• Statement of management commitment			
	• Summaries of applicable laws			
	• Description of company compliance organization, including contact information			
	• Policies and procedures for functions relevant to export compliance, including but not limited to: <ul style="list-style-type: none"> ○ Marketing/Sales (International Proposals) ○ Order Processing, including screening ○ Research/Development ○ Engineering ○ Technical Support ○ Logistics/Shipping ○ Licensing/Agreement Applications ○ Temporary imports (e.g., repair & return, incorporation & export) ○ Permanent imports (ATFE) ○ Licensing/Agreement Implementation ○ Technical Data ○ Foreign National Visits ○ Facility Tours ○ Foreign National Employees ○ International Travel ○ Hand-Carried Items ○ Recordkeeping ○ Training ○ Audit ○ Notification Requirements/ Reporting Violations ○ Offshore Procurement 			
4.	Does the compliance manual include product matrices identifying USML categories, ECCNs, /Schedule B Numbers? <ul style="list-style-type: none"> • Does the schedule include all commodities produced/sold by the company, including: 			

	<ul style="list-style-type: none"> ○ End-items ○ Components/spare parts ○ Items manufactured by third parties but sold by the company (if applicable) <ul style="list-style-type: none"> ● Who is responsible for maintaining the matrices? ● What is the process for updating the schedule? ● How is new product information conveyed to export compliance by R&D/Engineering, Purchasing, Sales/Marketing or other relevant departments? 			
5.	Are manuals, policies and procedures accessible to all employees?			
	<ul style="list-style-type: none"> ● If the company has an Intranet site, is it posted there? 			
	<ul style="list-style-type: none"> ● Describe content on Intranet site.. 			
	<ul style="list-style-type: none"> ● If no Intranet, are hard copies distributed? To whom? 			
	<ul style="list-style-type: none"> ● If none of the above, describe where compliance docs are housed. 			
	<ul style="list-style-type: none"> ● Are employees aware of how to access the manual, policies, procedures? 			
6.	Do compliance personnel use the manual, or other written policies & procedures?			
	<ul style="list-style-type: none"> ● How to they evaluate these materials? 			
7.	Are there procedures for updating the manual?			
	<ul style="list-style-type: none"> ● Do they include: <ul style="list-style-type: none"> ○ Monitoring of DDTC website ○ Monitoring of Federal Register ○ Monitoring business flow and corporate changes (e.g., mergers/acquisitions) ○ Regular reviews and updates (describe frequency) 			
Technology Control Plan/ Technical Data Control Plan				
8.	Does the company have TCPs, TTCPs or other similar documents? Obtain copies.			
9.	Does the TCP (or similar control control plan) address controls for:			
	<ul style="list-style-type: none"> ● Storage of data electronically 			

<ul style="list-style-type: none">• Transfer of data electronically• Storage of data in hard copy (locked files; clean desk policy)• Transfer of data via mail or courier• Transfer of data via facsimile• Transfer of data via hand-carry• In person meeting/conference requirements• Physical access controls (plant visits)• Marking of data• Identification of a compliance officer (including name, phone, email)• Requirement to report suspected unauthorized access to or disclosure of information			
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