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# *Prioritizing Export Compliance Efforts*



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## *Primary Questions:*

- What do we produce?
  - We sell information and technical assistance, not tangible items through the shipping dept.
- Where are our largest Export Compliance vulnerabilities?
  - Deemed Exports, Releases of Technology
- Where can we insert Export Compliance with an automatic method, vs. a manual method?
  - Become part of approval threads
  - Training and Lab Outreach
- In what areas will be potentially be audited?
  - Elements of a good Compliance Program
  - Self Assessments

# How will your Export Compliance Program be audited?

(Here's one example)

- Enforcement Keynote Address, Assistant Secretary Darryl W. Jackson, BIS Export Control Forum 2008, Newport Beach CA, March 17, 2008 ([http://www.bis.doc.gov/complianceandenforcement/update\\_west\\_2008\\_speech.pdf](http://www.bis.doc.gov/complianceandenforcement/update_west_2008_speech.pdf))
- **Principles of Effective Compliance Programs for Great Weight Mitigation in BIS's Administrative Cases**
  - **1. Whether the company has performed a meaningful risk analysis.**
  - **2. The existence of a formal written compliance program.**
  - **3. Whether appropriate senior organizational officials are responsible for overseeing the export compliance program.**
  - **4. Whether adequate training is provided to employees.**
  - **5. Whether the company adequately screens its customers and transactions.**
  - **6. Whether the company meets recordkeeping requirements.**
  - **7. The existence and operation of an internal system for reporting export violations.**
  - **8. The existence and result of internal/external reviews or audits.**
  - **9. Whether remedial activity has been taken in response to export violations.**

	URGENT	NOT URGENT
IMPORTANT	<ul style="list-style-type: none"> <li>•crises</li> <li>•pressing problems</li> <li>•deadline-driven projects, meetings, preparations</li> </ul>	<ul style="list-style-type: none"> <li>•preparation</li> <li>•prevention</li> <li>•values clarification</li> <li>•planning</li> <li>•relationship building</li> <li>•true recreation</li> <li>•empowerment</li> </ul>
NOT IMPORTANT	<ul style="list-style-type: none"> <li>•interruptions, some phone calls</li> <li>•some mail, some reports</li> <li>•some meetings</li> <li>•many proximate, pressing matters</li> <li>•many popular activities</li> </ul>	<ul style="list-style-type: none"> <li>•trivia, busy work</li> <li>•some phone calls</li> <li>•time wasters</li> <li>•“escape” activities</li> <li>•irrelevant mail</li> <li>•excessive TV</li> </ul>

■ Source: Seven Habits Of Highly Effective People by Stephen R. Covey (1990).

## Simple Priority Tasking Method

	Task	Comparison
1	Update Webpage	
2	Submit MPC&A ICL Request	
3	Inform CI of foreign Visit	
4	Review new WFO	
5	Renew ITAR registration	

- Method: Compare each line item two at a time, marking the higher priority for each case. The item(s) with the most marks are the highest priority.
  - Compare #1 to #2, #1 to #3, #1 to #4, #1 to #5.
  - Compare #2 to #3, #2 to #4, #2 to #5
  - Compare #3 to #4, #3 to #5
  - Compare #4 to #5