Release date: October 2, 2015

I.   Purpose

Training is a key element of the SI Export Compliance Program. The goal of training is to prevent export violations. The training instructs SI employees and affiliated persons about the export compliance procedures established at SI to comply with US Export and trade sanction laws and how employees need to integrate export compliance into their professional activities related to exporting, importing, hiring of non-US persons, collaborations with non US persons, travel and dealings with countries under US trade sanctions.

II.   Procedure

1. Inform SI employees in a consistent manner about the following topics during both live and self-paced on-line training sessions: Why export regulations exist and why SI employees need to be concerned about compliance. The session will also instruct about when they must inform the Export Compliance Officer (ECO) in advance, and of the actions they must take to ensure SI is in compliance with the regulations and maintain proper records.

2. Training topics to be covered:
    In fourtraining modules:
    - Is my Project Export Controlled?
    - Export Compliance and Technology Control Plans
    - Export Compliance and International Shipping issues
    - Export regulations and the Controls Lists –
        - Space and optics related or
        - Biological items, chemicals and export-controlled equipment related to research in life sciences

    Each session will instruct the trainee:
    - Why do export controls exist and how do they affect me?
    - What international regimes and USG agencies administer export regulations and why?
    - What is an "export", "deemed export", "fundamental research" and other key definitions that matter
    - Review of Proposals and Awards – what to look for
    - International Collaborations and Hiring of non US persons and Technology Controls
    - What Do I Need to Do to Take my Research Instruments with me Overseas?
    - Approval of Conferences and Meetings when Non-US Persons Are Present
    - Dealings in Sanctioned Countries – I Have had Dealings There Before, What Do I Need to Know?
    - Case Studies – Violations and Near Misses
    - Procurement issues

    On-line modules offer a general overview, and then additional modules directed toward the

researchers, research administrators, operational departments, international shipping, purchasing,

collaborations and sanctions programs.

3. Qualification of Trainers

The effectiveness of the Smithsonian Institution's Export Compliance Program depends on providing multi-level training by qualified trainers who have five or more years of experience. If on-line training is used, quality on-line training sessions should be selected from vendors who are deemed qualified by export compliance professionals working in similar research and government funded communities.

4. Schedule

Export Compliance Sessions need to be targeted but, due to the complexity of the topic and changing regulations, need to be offered repeatedly. This allows SI personnel to become familiar with the requirements. The goal is to understand when they need to inform key export-compliance tasked personnel and follow the SI process to evaluate if government approval is required and to maintain proper records.

Sessions are provided to each unit annually, with open sessions on the mall quarterly.

5. Types of training
There are multi- levels of training to have an effective training program.

Role	Training	Frequency and Quantity
EC Personnel: ECO and Backup Empowered Officials (EOs)	Annual Conferences and periodic subject-matter specific training related to updates to ITAR, EAR, FACR, and FTR	2 days annually plus 2 subject matter sessions related to changes in regulations.
SI Primary EO	EO training in ITAR SI-specific training	Annually Annually
Administrators in each Unit	1 Session on Export Controls and Technology Control Plans 1 Session on International Shipping	Annually
Executive Staff and Administrative Councils	Export Compliance Overview	Annually

Researchers and PIs at Science Units	Overview Training Export Compliance for Researchers I and II	Annually
Export Compliance Coordinators (ECC)	in-depth training provided by ECO	Annually Half day
Classification Team and Technology Control Officers (TCOs) SAO NASM SERC NMNH SCBI STRI	Topic specific classes in Space and USML/CCL Topics specific in biological, chemical items	Annually or when new regulations are published

6. Certification

Attendees shall obtain certificates of attendance. EOs and ECC must pass a certification test developed by the ECO.

7. Training Evaluation:

Attendees are requested to complete an evaluation form (See sample, Attachment 1) to continually improve the training format and message.

8. Training Records

Attendees shall obtain certificates of attendance or retain training materials as evidence of training consistent with HR requirements. Internal training will be documented by using a sign-in sheet. On-line classes are recorded in Moodle and uploaded to HR.

III.   References
- SD 611 Export Compliance and Trade Sanctions Related to Research, Export and Museum Activities

- Contact: Natascha Finnerty, Export Compliance Officer about questions related to this procedure at export@si.edu and telephone is (617) 496-7557.
- Records:
    - o Training materials
    - o Training invite/attendee list
    - o Training certification tests

Last Updated:

Figure 1:

Evaluation Form

Export Compliance
April 30, 2015 SAO 2:00 pm – 3:00 pm
Presenter: Natascha Finnerty, ECO

1. Where did you hear about this program?_____
2. Please rate your overall experience of this program.   Poor Fair Good   Excellent Superior
3. What is your overall rating of the presenter (s)?   Poor Fair Good   Excellent Superior
3. Did this program meet your expectations?   Yes   No
4. Will this information be useful in your job?   Yes   No
5. Were audiovisual materials or handouts used?   Yes   No
   -Were they helpful?   Yes   No
   -What made them helpful? _____
6. What did you like best about this program?_____
   _____
6. What did you like least about this program? _____
   _____
6. Was there enough time for questions and answers?   Yes   No
7. Did the speaker(s) encourage participation?   Yes   No
10. Are there any improvements on the current program or other types of programs you might suggest to improve the Export Compliance Training?_____
   _____

Please include the following information (optional):

Name_____Unit_____