

EXPORT COMPLIANCE PROCEDURE (ECP) # 5.3  
COMPLETING CORRECTIVE ACTIONS

Released 10/7/15

## I. Purpose

This document explains the procedure at SI to address major findings reported in export compliance audit activities to comply with U.S. export law. The document details the methodology to monitor corrective actions.

## II. Procedure

1. For formal audits, the auditor prepares a written report of observations and findings to the Unit Director and the **Office of General Counsel (OGC)** within two weeks. The **ECO** and the **OGC** review the findings and corrective actions of proposed employees, contractors and their managers.
2. The **SI ECO** works with **OGC** and the **Unit Director** to review the findings and the corrective actions proposed by the Unit. **Unit management** and the **Unit Export Compliance Coordinator** follow up until the findings are corrected, resolved, or determined to not requiring a correction, due to a single incident and not a systemic problem.
3. If a violation of the export regulations is discovered, the auditor directs such information to the **Unit Director**, and **OGC**. **If there is a violation of the export regulations, OGC** determines if a voluntary disclosure will be filed and contacts the **Office of Inspector General**. The **OGC** and **OIG** determine if a voluntary disclosure is in order. See ECP 5.4.
4. The **Unit Director** follows up until the findings are corrected or resolved, as not requiring correction, due to a single incident and not a systemic problem. Follow up training is also considered.

## III. Reference

SI's Directive No. 611 Compliance with Export Controls and Trade Sanctions related to Exports, Research and Museum Activities.

Any questions should be directed to Natascha Finnerty, Export Compliance Officer (ECO) at (617) 496-7557 or email at [export@si.edu](mailto:export@si.edu).

[BIS Export Management and Compliance Program Guidelines](#)

- Responsibility

**ECO** or outside consultant

All **Units** and

Senior EO  
Back up EOs  
Contracting Officers

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Subjects of Audits  
PIs of SI Research Centers  
Smithsonian Enterprises (SE)  
Divisional Administrators  
Program Manager (PM)  
Museum Registrars  
Scholars

**Units Responsible for Flagging International Projects**

Office of International Relations (OIR)  
Office of Sponsored Projects (OSP)  
Office of Contracting and Personal Property Officer (OCON & PPM)