

MITA: Export Compliance

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WAUKESHA
COUNTY TECHNICAL
COLLEGE

Hands-on
Higher Ed



Export Compliance Program/Manual

- **Export Administration Regulations (EAR)**
- International Traffic in Arms Regulations (ITAR)
- Office of Foreign Assets Control (OFAC)
- Foreign Trade Regulations (FTR)
- Foreign Corrupt Practices Act (FCPA)
- Free Trade Agreements (FTAs)
- Antiboycott Regulations (part of EAR)



Key Elements of an ECP (EAR/BIS)

- Management Commitment
- Risk Assessment
- **Export Authorization**
- Recordkeeping
- **Training**
- Audits
- Handling Compliance Issues
- **Maintaining an ECP**





Export Authorization

- WHAT are you exporting?
 - Commodity Jurisdiction (State or Commerce)
- WHERE is it going?
 - Commerce Country Chart, OFAC sanctions
- WHO will receive your item?
 - Restricted Party Screening
- WHAT will your item be used for?

Procedures, recordkeeping, training, auditing



Training

- Resources
 - Trade Associations - MITA, WTA (<https://www.mmac.org/international.html>)
 - Government agencies - BIS, OFAC, DDTC, etc.
 - Schools – UW, WCTC
 - Service providers - Freight Forwarders, Consultants, Law Firms, etc.
 - Email updates - The Daily Bugle, International Compliance Professionals Association (ICPA, <https://www.icpainc.org/>)
- Required as part of job description/performance evaluation
 - Accounting, Compliance, Credit/Finance, Customer Service, Engineering, Logistics, Sales/Marketing, Supply Chain, etc.
- Keep records of seminars, internal “lunch & learns”, etc.



Maintaining an ECP

- Team effort, not just Compliance
- Keep updated for changes in the regulations, and within the company
- BIS Compliance Guidelines, 8 Key Elements and Audit Module

Element 6: AUDITS

	✓	+	△	N/A
Procedures are performed as written and the compliance program is ongoing.				
Qualified individual (or auditing group) is designated to conduct internal audits.				
Use of a standard audit module or self-assessment tool.				
Specific unit/functional level audits are performed.				
Program level audits are performed.				



Thank you

ECP Workshop, May 14, 2021

9am-3pm

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