

# **EXPORT CONTROL INTERNAL COMPLIANCE**

## **Qualification Card for Export Compliance Administrator (ECA)**

<b>Name:</b>	<b>Site lead ECA name:</b>	<b>Date initiated:</b>
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This Qualification Card is designed to serve as a foundational template for laboratories, sites, and facilities committed to developing and recognizing expertise among personnel in the field of Export Compliance Administration (ECA). It is structured to document the progression of an individual's qualifications, their understanding and application of relevant federal regulations and guidelines, and the demonstration of their skills across three distinct levels: Apprentice, Journeyman, and Expert. Additionally, this card includes a section for supplemental training aimed at facilitating the acquisition of specialized experience, further enhancing the professional's capability in managing export compliance responsibilities.

It is essential to recognize that while this document provides a comprehensive framework for standardizing the development of ECA professionals, it is intended to be adaptable. Laboratories, plants, and sites are encouraged to modify this template as necessary to align with their unique operational requirements, regulatory obligations, and export control challenges. This flexibility ensures that the Qualification Card remains a relevant and effective tool for professional growth, compliance, and excellence in export control management.

The implementation of this Qualification Card should help establish a clear pathway for professional development, ensure a consistent understanding and adherence to federal guidelines, and recognize the attainment of specialized skills and knowledge. This document reflects your personal and organizational commitment to maintaining the highest standards of accountability and efficiency in export compliance administration.

Trainees and ECA Site Leads/Export Compliance Managers are encouraged to engage in this process with a spirit of collaboration, dedication to excellence, and a continuous pursuit of professional development. The goal is to cultivate a culture of competence, integrity, and responsibility, ensuring the highest standards of performance in the administration of export compliance.

<b>QUALIFICATIONS</b>	
<b>Training</b>	<b>Certificate Date</b>
<b>High Risk Property (HRP) Awareness (2-hour virtual)</b> —Raises awareness of HRP requirements and responsibilities, introducing HRP, its presence within the U.S. Department of Energy's National Nuclear Security Administration (DOE/NNSA) complex, and strategies for mitigating proliferation risks. Targeted at DOE and contractor personnel involved in the life cycle management of proliferation-sensitive property, the course addresses key roles in property management, procurement, and export control. Go to <a href="https://hrp.doe.gov/Event/List">https://hrp.doe.gov/Event/List</a> .	
<b>Export Control Awareness (2-hour virtual)</b> —Provides U.S. Government federal employees, their staff, and contractors with an overview of export control responsibilities, emphasizing compliance and the impact of regulations on their programs. Participants will learn about controlled technology and key contacts for assistance in navigating export control requirements. Go to <a href="https://ecap.learning.ornl.gov">https://ecap.learning.ornl.gov</a> or email <a href="mailto:ecap@ornl.gov">ecap@ornl.gov</a> .	
<b>Nonproliferation for High Risk Property Management (3-day in-person)</b> —Covers the fundamentals of U.S. nonproliferation policy and the requirements for handling proliferation-sensitive equipment and materials, with a focus on key aspects of controlled equipment. Participants engage in hands-on exercises, interactive modules, and a capstone exercise to demonstrate their knowledge and skills in the life cycle management of proliferation-sensitive property. Go to <a href="https://hrp.doe.gov/Event/List">https://hrp.doe.gov/Event/List</a> .	
<b>Export Controlled Information (ECI) Workshop (2-day in-person)</b> —Provides U.S. Government federal employees, their staff, and contractors with a foundational understanding of U.S. nonproliferation policy and export control regulations, focusing on reviewing, handling, and marking proliferation-sensitive information and ECI. Participants engage in detailed regulatory reviews, hands-on exercises, and interactive modules to enhance their knowledge and skills in managing controlled technology. Go to <a href="https://ecap.learning.ornl.gov">https://ecap.learning.ornl.gov</a> or email <a href="mailto:ecap@ornl.gov">ecap@ornl.gov</a> .	

QUALIFICATIONS	
<b>Department of Commerce: Complying with U.S. Export Controls (1–2 day)</b> —Core courses on the Export Administration Regulations (EAR) as well as in-depth courses on special topics of interest to the exporting community. Instructors are experienced export administration and regulatory policy specialists, engineers and enforcement personnel from the Bureau of Industry and Security’s (BIS’s) Washington, DC, headquarters and field offices, as well as representatives from other U.S. Government agencies as appropriate. Go to <a href="https://www.bis.doc.gov/index.php/compliance-a-training/export-administration-regulations-training">https://www.bis.doc.gov/index.php/compliance-a-training/export-administration-regulations-training</a> .	
<b>Department of State: International Traffic in Arms Regulations (ITAR) Basics or the Society for International Affairs (SIA) Basics Conference (or similar)</b> —Designed for newcomers to export licensing. Participants receive a comprehensive, step-by-step guide on exporting articles on the U.S. Munitions List and the Commerce Control List, including insights into the license application process and requirements from the Departments of State and Commerce.	
<b>Department of Commerce: Technology Controls</b> —Presents the challenges with technology controls and effective strategies for export compliance programs. Go to <a href="https://www.bis.doc.gov/index.php/compliance-a-training/current-seminar-schedule">https://www.bis.doc.gov/index.php/compliance-a-training/current-seminar-schedule</a> .	
<b>Department of Commerce: Creating an Effective Export Compliance Program (video)</b> —Presents the elements of an effective export compliance program for EAR, administered and enforced by the Bureau of Industry and Security.	
<b>Department of Commerce: Annual Update (biennial)</b> —The BIS conference features sessions on a range of topics, including semiconductor tools and advanced computing, regulatory updates, foreign direct product rules, investigations of disruptive technologies, export control officers abroad, human rights due diligence, and various updates related to Directorate of Defense Trade Controls, Census, and international cooperation in export controls.	
<b>Export Control Coordinator’s Organization Annual Workshop (biennial)</b> —A series of presentations and discussions on trade controls, export compliance, and emerging technologies, featuring speakers from various organizations, along with opportunities for laboratory sharing and networking, culminating in a facilitated discussion at the end of each day.	
<i>On-the-job training with the lead ECA to gain knowledge and experience in export compliance customer interactions, research, review, evaluation, determination and documentation, etc. (8–12 months)</i>	

READING AND FULL COMPREHENSION	
<i>Trainees will review materials and log into the learning management system for evaluation. Upon completion of evaluation, trainees will document on this qualification card. Go to <a href="https://ecap.learning.ornl.gov">https://ecap.learning.ornl.gov</a>.</i>	Date Evaluation Completed
<b>NNSA Policy, NAP-476.1, Atomic Energy Act Control of Import and Export Activities</b> —Outlines the procedures and responsibilities for controlling import and export activities under the Atomic Energy Act, ensuring compliance with U.S. laws and regulations related to the transfer of nuclear materials and technology to safeguard national security and promote nonproliferation objectives.	
<b>International Traffic in Arms Regulation (ITAR) 22 CFR 120-130</b> —Controls the export and import of defense-related articles and services to safeguard U.S. national security and foreign policy interests.	
<b>Export Administration Regulations (EAR) 15 CFR 730-774</b> —Governs the export and re-export of commercial and dual-use goods, technology, and software from the United States to ensure national security and foreign policy objectives are met.	
<b>Department of Energy (DOE) Regulations 10 CFR 810</b> —Establishes the requirements for the export of unclassified nuclear technology and assistance to ensure compliance with U.S. nonproliferation policies and national security objectives.	
<b>Nuclear Regulatory Commission 10 CFR 110</b> —Governs the export and import of nuclear materials and equipment to ensure the safe and secure use of nuclear technology in compliance with U.S. laws and international agreements.	
<b>Foreign Assets Control Regulations 31 CFR 500-598</b> Implements U.S. economic sanctions and trade restrictions against foreign countries and regimes, as well as individuals and entities involved in activities that threaten national security, foreign policy, or the economy.	
<b>10 CFR 1017 Identification and Protection of Unclassified Controlled Nuclear Information (UCNI)</b> — Establishes the requirements for the identification and protection of Unclassified Controlled Nuclear Information, ensuring that sensitive nuclear-related information is adequately safeguarded to prevent unauthorized disclosure while promoting compliance with national security and regulatory standards.	

<b>READING AND FULL COMPREHENSION</b>	
<b>DOE Property Management 41 CFR 109-1.53</b> —Establishes the regulations for the management of property under the jurisdiction of DOE, detailing requirements for the acquisition, use, accountability, and disposal of government property to ensure effective stewardship and compliance with federal laws.	
<b>DOE Order (DOE O) 471.7 Control of Unclassified Information</b> —Establishes policies and procedures for the management of Controlled Unclassified Information (CUI) within DOE. This order outlines the requirements for identifying, safeguarding, and disseminating CUI to ensure compliance with federal regulations and protect sensitive information while promoting information sharing and transparency.	
<b>DOE Order (DOE O) 241.1C DOE Cybersecurity Program</b> —Establishes the framework for DOE's cybersecurity program, outlining policies, responsibilities, and requirements for protecting the Department's information and information systems from cyber threats. This order emphasizes the importance of risk management, continuous monitoring, and incident response to ensure the security and resilience of DOE's critical infrastructure and sensitive information.	
<b>DOE Order (DOE O) 205.1B Cyber Security Management Program</b> —Outlines the framework for the Cyber Security Management Program within DOE, establishing policies and procedures to protect sensitive information and critical infrastructure from cyber threats while ensuring compliance with federal cybersecurity standards.	
<b>DOE Order (DOE O) 142.3B Chg. 1 Foreign Visits and Assignments</b> —Provides guidelines for managing foreign visits and assignments to DOE facilities, focusing on the protection of sensitive information and national security by establishing procedures for screening, approval, and oversight of foreign visitors and assignments.	
<b>DOE Order (DOE O) 481.1C Strategic Partnership Projects</b> —Outlines the policies and procedures for Strategic Partnership Projects within DOE, facilitating collaboration with external partners to leverage resources and expertise for advancing research, development, and technology transfer while ensuring compliance with applicable laws and regulations.	
<b>DOE Order (DOE O) 482.1 DOE Facilities Technology Partnering Programs (User Facilities)</b> —Establishes the policies and procedures for DOE's Facilities Technology Partnering Programs, also known as User Facilities, promoting collaboration with external entities to enhance access to and utilization of DOE research facilities while ensuring effective management and compliance with relevant regulations.	
<b>DOE Order (DOE O) 483.1 Cooperative Research and Development Agreements (CRADAs)</b> —Outlines the policies and procedures for establishing Cooperative Research and Development Agreements within DOE, facilitating collaboration between DOE and external partners to advance research and development while ensuring the protection of intellectual property and compliance with applicable laws.	
<b>DOE Order (DOE O) 484.1 Reimbursable Work for Department of Homeland Security</b> —Establishes the policies and procedures for conducting reimbursable work for the Department of Homeland Security, outlining the framework for collaboration, resource allocation, and financial management to support joint initiatives while ensuring compliance with federal regulations and agreements.	
<b>DOE Order (DOE O) 551.1D Official Foreign Travel</b> —Outlines the policies and procedures for official foreign travel by Department of Energy employees, emphasizing the need for proper authorization, risk assessment, and compliance with security and reporting requirements to ensure the safety and effectiveness of such travel.	
<b>DOE Manual (DOE M471.3-1) for Identifying and Protecting Official Use Only Information</b> —Serves as a manual for identifying and protecting Official Use Only information, detailing specific procedures, responsibilities, and best practices for the proper handling and safeguarding of sensitive but unclassified information within DOE.	
<b>DOE Acquisition Guide, Chapter 25 Export Controls 48 CFR 925</b> —Provides guidance on compliance with export control laws and regulations in the procurement process, ensuring that DOE acquisitions adhere to national security and foreign policy requirements related to the export of sensitive technologies and information.	
<i>Other export control regulations for the Bureau of Alcohol, Tobacco, Firearms, and Explosives; Environmental Protection Agency; Department of Administration; Food and Drug Administration; etc.</i>	
<i>International regimes/treaties, agreements such as the Missile Technology Control Regime, Australia Group, Wassenaar Arrangement, and the Treaty on the Non-Proliferation of Nuclear Weapons.</i>	

DEMONSTRATED SKILLS			
<i>ECA site lead will annotate as trainee graduates in skill level by date.</i>	Apprentice	Journeyman	Expert
Demonstrate proficiency with the various technical parameters, specifications, and policies associated with the agencies referenced above.			
Demonstrate proficiency in export license applications and implementation.			
Demonstrate proficiency in activities covered by the DOE orders referenced above.			
Demonstrate proficiency in all areas requiring oversight and review, as referenced in DOE Acquisition Guide Chapter 25.			
Demonstrate an understanding of U.S. Restricted Parties (sanctions and embargoes) and end-user screening in accordance with Office of Foreign Assets Control, Department of State, and Department of Commerce requirements.			
Demonstration proficiency in document marking and handling, including property marking of ECI.			

*I have completed the training, required reading, and on-the-job training referenced above. I am prepared to assume the duties of an ECA.*

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**Trainee Signature** **Date**

*The abovenamed individual is qualified to perform the duties of an ECA.*

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**ECA Site Lead or Export Compliance Manager Signature** **Date**

The following informational training courses/workshops are supplemental to export compliance qualification, but highly recommended:

SUPPLEMENTAL TRAINING	
Course Descriptions	Certificate Date
<b>Department of State: Advanced ITAR (provided by SIA)</b> —Forum focusing on policy and advanced licensing issues, regulatory updates, legislative activity, foreign policy issues, and other relevant advanced topics. Go to <a href="https://www.siaed.org/SIA-CONFERENCES-AND-WEBINARS">https://www.siaed.org/SIA-CONFERENCES-AND-WEBINARS</a> .	
<b>Department of Commerce: Encryption Controls (virtual)</b> —Covers encryption provisions under the EAR, including controls, classification, deemed exports, and foreign product development, featuring live Q&A and access to reference materials and session recordings. Go to <a href="https://www.bis.doc.gov/index.php/compliance-a-training/current-seminar-schedule">https://www.bis.doc.gov/index.php/compliance-a-training/current-seminar-schedule</a> .	
<b>Nuclear Regulatory Commission: Regulatory Information Conference</b> —The U.S. Nuclear Regulatory Commission’s Annual Regulatory Information Conference gathers more than 3,000 attendees from more than 40 countries to discuss key nuclear regulatory issues, featuring a diverse technical program, interactive exhibits, and tours of the NRC Operations Center. Go to <a href="https://www.nrc.gov/public-involve/conference-symposia/ric/index.html">https://www.nrc.gov/public-involve/conference-symposia/ric/index.html</a> .	
<i>Various DOE/NNSA sponsored nonproliferation courses (as applicable). Go to <a href="https://one.ornl.gov">https://one.ornl.gov</a>. If you have difficulty opening the Workshop Series Flyer link, please contact Cathy Bynum at <a href="mailto:cbynum@anl.gov">cbynum@anl.gov</a> for an emailed flyer.</i>	

For questions, please contact the ECAP team at [ecap@ornl.gov](mailto:ecap@ornl.gov).

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