

**BUREAU OF INDUSTRY AND SECURITY
OFFICE OF THE ASSISTANT SECRETARY FOR EXPORT ADMINISTRATION
OFFICE OF EXPORTER SERVICES
EXPORT MANAGEMENT AND COMPLIANCE DIVISION**

**EXPORT COMPLIANCE SPECIALIST
GS-1801-12**

I. INTRODUCTION

This position is located in the Department of Commerce (DOC), Bureau of Industry and Security (BIS), Office of the Assistant Secretary for Export Administration (EA), Office of Exporter Services (OExS), Export Management and Compliance Division (EMCD).

EMCD evaluates all-source information, including publicly available and government-privileged information, to provide information to BIS and the interagency export control community to inform adjudication of export control license applications, promote U.S. exports by preventing the diversion or misuse of export controlled items abroad through outreach and cooperation with foreign governments, identify potential violators of export control laws that imperil U.S. national security; and support law enforcement actions that could result in both criminal and civil penalties, thereby encouraging compliance with the U.S. export control regime.

This position is responsible for the analysis of investigation/compliance cases, licensing and trade data, agreements and/or monitoring programs, and based on these analyses, the preparation of summaries of their findings and/or recommendations on their disposition, ultimately supporting licensing, compliance, and investigative activities. Throughout the process, the incumbent must consider the interests of the U.S. Congress, the U.S. Military, the international community, the intelligence community, other law enforcement agencies, private industry and the public.

This position is required to have access to classified national security information.

II. MAJOR DUTIES AND RESPONSIBILITIES

Is responsible for complex assignments in the program area; analyzes and evaluates all-source data in an investigative context; conducts research and assists in the verification of data; participates in meetings and briefings; prepares recommendations for the disposition of assignments.

1. Individually conducts research and/or investigations of entities and transactions, evaluates findings, assesses evidence for factual and legal sufficiency, and determines whether further investigation is required to support an enforcement action.

2. Independently prepares written products to inform customers of findings and/or recommendations for actions.
3. Assists senior compliance officers in their more complex investigations conducts research; develops investigative materials; assists in reviewing documents and case-file organization; recommends further action.
4. Effectively expresses ideas both orally and in writing to senior compliance officers, special agents, leadership, and representatives within the interagency

III. FACTOR LEVELS

Factor 1 - Knowledge Required by the Position

FL 1-7, 1250 pts

Thorough knowledge of U.S. export control regulations and national security issues and procedures to perform investigation, enforcement or compliance work.

Thorough knowledge of investigative and compliance review methods, use of information sources, and protocols specific to assigned programs and cases.

Ability to research, analyze, and interpret all-source data, including trade and licensing data, and provide summaries and recommendation for actions and decisions.

Ability to identify and differentiate between major and minor problems in relation to export control and national security issues.

Knowledge of international export control regimes that will enable the ability to independently handle moderately complex problems.

Ability to brief moderately complex export control issues to senior officials.

Ability to compose reports clearly and concisely in a variety of formats.

Knowledge sufficient to serve as an authoritative bureau spokesperson to outside organizations to include diplomatic, military, enforcement, regulatory, and intelligence community counterparts for the purpose of receiving information and providing support to law enforcement investigations.

Factor 2 - Supervisory Controls

FL 2-4, 450 pts

Supervisor provides general direction and guidance on broad objectives and policies. Employee works independently and is expected to generate finished work products subject only to administrative review and is relied upon for technical determinations within the program area.

Factor 3 - Guidelines**FL 3-4, 450 pts**

Export Administration, information handling, intelligence, and security guidelines exist in the form of regulations, policy, procedures and management plans. Export control guidelines are the U.S. Code of Federal Regulations; the Export Control Reform Act, and its implementing Export Administration Regulations; criminal statutes and precedent court decisions; BIS policies and procedures, functional memoranda and other pertinent agency regulations.

Although guidelines are available, they may not be completely applicable to the work or have gaps in specificity. The employee uses judgment in interpreting and adapting guidelines such as activity policies, regulations, precedents, and work directions for applications to specific cases or problems. The employee analyzes results and recommends changes.

Factor 4 -Complexity**FL 4-4, 225 pts**

Assignments consist of diverse and often unrelated steps and processes which require analysis of complex information and selection among alternative approaches to assignments. Decisions must consider handling of unusual circumstances, need to refine work methods, and reconciliation of conflicting data.

Factor 5 -Scope and Effect**FL 5-4, 225 pts**

The purpose of the work is to ensure that the applicable U.S. laws, regulations and agreements are fairly and effectively enforced through investigation and/or compliance monitoring work addressing complex or unusual problems. Efforts directly impact significant U.S. Government Court decisions, which have substantial effects on domestic/foreign businesses, industries and/or other agencies.

Factor 6 -Personal Contacts**FL 6-3**

Contacts include employees and managers throughout the organization, officials of other agencies or state and local governments involved in the assignment area, foreign counterparts and representatives of business, and/or the public.

Factor -7 Purpose of Contacts**FL 7-c, 180 pts**

Contacts are to gather and exchange data and information, to persuade or influence others to adapt desired courses of action, or to exercise various regulatory controls and authorities.

Factor -8 Physical Demands**FL 8-1, 5 pts**

Work is primarily sedentary.

Factor -9 Work Environment

FL 9-1, 5 pts

The work is normally performed in a standard office setting.

Total: 2790 pts

Grade: GS-12

Career Ladder: PD# BI0624-GS-1801-13

IV. UNIQUE POSITION REQUIREMENTS

FLSA: This position is **Exempt** from coverage under the Fair Labor Standards Act.

Drug Testing: The incumbent of this position is subject to random drug testing. Incumbent must pass urinalysis testing prior to appointment and periodically thereafter.

Position Sensitivity: This position is designated **non-critical sensitive**. Incumbent must be able to obtain and maintain a **Secret** security clearance based on a single-scope background investigation (SSBI). Incumbent of the position will also be required to complete an SF-3 12, Classified Non-disclosure Agreement.

Financial Disclosure: Title 5 CFR, part 2634, requires the incumbent of this position to file an Initial and annual SF-450, Confidential Financial Disclosure Report and attend annual ethics Training.

FACTOR EVALUATION SYSTEM
POSITION EVALUATION STATEMENT

Title, Series and Grade: EXPORT COMPLIANCE SPECIALIST (GS-1801-12)

Organization: Department of Commerce (DOC), Bureau of Industry and Security (BIS), Office of the Assistant Secretary for Export Administration (EA), Office of Exporter Services (OExS).

Series Determination: This position is classified in the GS-1801 series using the Classification Standard for Administrative Work in the Inspection, Investigation, Enforcement, and Compliance Group, 1800 series, Issued March 2009, Revised April 2011. This series covers positions which supervise, lead, or perform inspection, investigation, enforcement, or compliance work. Because the position is non-supervisory the appropriate title is Export Compliance Specialist.

Evaluation Factors	Points Assigned	Standard Used (Factor Level)
1. Knowledge Required	1250	FL 1-7
2. Supervisory Control	450	FL 2-4
3. Guidelines	450	FL 3-4
4. Complexity	225	FL 4-4
5. Scope and Effect	225	FL 5-4
6. Personal Contacts/ 7. Purpose of Contacts	180	FL 6/3; 7C
8. Physical Demands	5	FL 8-1
9. Work Environment	5	FL 9-1
Total Points	2790	
Grade Conversion: GS-12		

Classified by:
Sheila Moore,
HR Specialist
08/20/2019

Position Designation Record

Agency	Bureau of Industry and Security
Position Title	Export Compliance Specialist
Series and Grade/Pay	GS-1801- <i>12</i>
Band	
Position Description	BI <i>0624</i>
Number	
Designator's Name & Title	Kathleen Barfield, EA Program Manager

National Duties

Degree of Potential for Compromise or Damage

Requires eligibility for access to classified information

- Position requires eligibility for access to Secret, Confidential, or "L" level information

Unclassified information (e.g. private, controlled unclassified, or proprietary information)

- Limited access to and control over unclassified information, which may include private, proprietary or other controlled unclassified information, but only where the unauthorized disclosure of that information could cause significant or serious damage to national security

Potential for Compromise or Damage

Duties

Degree of Potential for Compromise or Damage

Government operations – rulemaking, policy, and major program responsibility (includes regulation or policy making, directing, implementing, advising and audits)

- Senior management official for critical government programs, the compromise of which could result in grave damage to the public's trust

Duties

Protection of personal, private, controlled unclassified, or proprietary information-with the potential to damage the public's trust (includes access to or processing of personal information such as that protected by the Privacy Act (PA) of 1974, exempt from disclosure under the Freedom of Information Act (FOIA), financial data, or privileged information involving the award of contracts, contractor proprietary information, etc.)

Degree of Potential for Compromise or Damage

Access and control over personal, private, proprietary, or controlled unclassified information, the unauthorized disclosure of which could negatively impact the public's trust, through serious damage/harm to:

- The integrity or efficiency of the service
- Individuals or business entities
- Government programs or operations impacting the public's trust

Investigation

T5

Form Required

SF 86

Sensitivity

Non-Critical Sensitive

Risk Level

High Risk

Signature: Kathleen BarfieldDate: 8/7/19Name: Kathleen Barfield