

BUREAU OF INDUSTRY AND SECURITY
OFFICE OF THE ASSISTANT SECRETARY FOR EXPORT ADMINISTRATION
OFFICE OF STRATEGIC INDUSTRIES AND ECONOMIC SECURITY
MUNITIONS CONTROL DIVISION

EXPORT COMPLIANCE SPECIALIST
GS-1801-13

I. INTRODUCTION

This position is located in the Bureau of Industry and Security (BIS), Office of the Assistant Secretary for Export Administration (EA), Office of Strategic Industries and Economic Security (SIES), Munitions Control Division (MCD).

This position is independently responsible for handling all phases of complex investigation/compliance cases, agreements and/or monitoring programs, and based on these analyses, prepares recommendations on their disposition.

II. MAJOR DUTIES AND RESPONSIBILITIES

- Acts as agency representative on matters involving export data to confirm compliance with the Export Administration Regulations (EAR) across a variety of license and license exception types.
- Responsible for the planning, coordination and completion of complex assignments in the program area; discharges investigative responsibilities; analyzes and evaluates complex data; participates in and helps conduct meetings, briefings and audits; and assists in the verification of data. Supports office's activity to resolve problems associated with regulatory compliance, including questions related to compliance with the Export Administration Regulations (EAR) and the International Traffic in Arms Regulations (ITAR).
- Applies the principles of investigative research and analysis to identify possible instances of diversion of U.S. technology from authorized purposes to military or terrorist applications critical to U.S. national security interests.
- Focuses on obvious violations of established regulations and determine if they are criminal in nature.
- Substantiates assertions of violations or actual violations of export controls by factually delineating a plausible chain of circumstances, events or actions of specific entities suspected of involvement in export diversion.
- Conducts transaction-level analysis to reveal patterns and trends of violations and potential violations of export control laws and regulations.
- Develops, reviews and finalizes a variety of written products and orally presents, to include, but not limited to, recommendations for investigative action by federal law enforcement agents, regulatory actions, administrative action, public outreach, or policy engagement.
- Conduct informal interviews to determine facts and obtain documentation in furtherance of administrative inquires.
- Serves as a licensing officer who primarily reviews and processes export license applications, submitted by industry, for National Security and Foreign Policy concerns. As a licensing officer, this incumbent will use multiple classified systems (JWICS and USXports on SIPRnet). They attend and represents the Bureau at interagency meetings and briefings that are held at the TS/SCI level.

III. FACTOR LEVELS

Factor 1 - Knowledge Required by the Position FL 1-8, 1550 pts

Thorough knowledge of U.S. laws, the Export Administration Regulations, acts, executive orders and agreements which govern the investigative and/or compliance work for which the employee is responsible.

Expert knowledge of the theories, dynamics and factors underlying investigation/compliance area to enable authoritative and independent handling of programs and functions.

Expert knowledge of the roles, responsibilities and programs of government agencies, private sector interests, and other involved in the investigation/compliance area sufficient to guide and coordinate external contributions to programs and services and to disseminate information to concerned agencies.

Demonstrated ability to effectively and independently analyze and communicate sound and authoritative recommendations on highly complex and sensitive investigation/compliance issues/policies.

Knowledge sufficient to serve as recognized technical authority in the investigation/compliance area and to serve as an authoritative bureau spokesperson to outside organizations.

Strong communication skills sufficient to convince audiences including outside agencies and private sector representatives with divergent and conflicting views on issues involved.

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

Guidelines include federal, agency, program, legal, subject-matter references and precedent situations. Assignments require initiative and resourcefulness to deviate from established practices or precedents, and the employee uses judgment to generate new approaches to problems and unique situations.

Factor 4 - Complexity FL 4-5, 325 pts

The incumbent must consider, assess and frequently reconcile numerous and diverse variable and interests in developing program approaches and positions. Issues faced require extensive analysis, and decisions and recommendations reflect the need to balance sensitive investigation/compliance information with expert interpretation and analysis performed by the employee.

Factor 5 - Scope and Effect FL 5-5, 325 pts

The purpose of the work is to plan, manage, and successfully ensure that applicable U.S. laws, regulations, and agreements are enforced. The employee impacts effectiveness of operations, quality of government services, and relationships with domestic/foreign businesses, and/or other agencies and governments.

Factor 6 - Personal Contacts FL 6-3, 60 points

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 7-3, 120 pts

The purpose is to influence, motivate or persuade persons or groups. The persons contacted may be fearful, skeptical or uncooperative. Therefore, the employee must be skillful in approaching the individual or group in order to obtain the desired effect, such as gaining compliance with established policies and regulations by persuasion or negotiation or gaining information by establishing rapport with a suspicious informant.

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; however, some travel may be required.

Total: 3290 pts
Grade: GS-13

This position is at the full FPL.

IV. UNIQUE POSITION REQUIREMENTS

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

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

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.

Position Sensitivity: This position is designated **special sensitive**. Incumbent must successfully complete a background security investigation prior to appointment and must be able to obtain and retain a **Top-Secret/SCI** security clearance. Incumbent of the position will also be required to complete an SF-312, Classified Non-disclosure Agreement.

FACTOR EVALUATION SYSTEM
POSITION EVALUATION STATEMENT

Title, Series and Grade: EXPORT COMPLIANCE SPECIALIST (GS-1801-13)

Organization: Department of Commerce (DOC), Bureau of Industry and Security (BIS), Office of the Assistant Secretary for Export Administration (EA), Office of Strategic Industries and Economic Security (SIES), Munitions Control Division (MCD).


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	1550	FL 1-8
2. Supervisory Control	450	FL 2-4
3. Guidelines	450	FL 3-4
4. Complexity	325	FL 4-5
5. Scope and Effect	325	FL 5-5
6. Personal Contacts/ Purpose of Contacts	180	FL 6-3; 7-C
7.		
8. Physical Demands	5	FL 8-1
Work Environment	5	FL 9-1
Total Points	3290	
Grade Conversion: GS-13		

Classified by:
Sheila Moore,
HR Specialist
12/6/2019

Position Designation Record

Agency DEPT OF COMMERCE-BUREAU OF INDUSTRY AND SECURITY
 Position Title Export Compliance Specialist
 Position Description
 Series and Grade/Pay Band GS -13
 Position Description Number B10654
 Designator's Name & Title Thomas DeFee Acting Director, Munitions Control Division

 12/25/19

Final Position Designation and Investigation

Sensitivity Level	Risk Level	Investigation	Form
Special-Sensitive	High Risk	Tier 5	SF 86

Summary

National Security

National Duties	Degree of Potential for Compromise or Damage
Requires eligibility for access to classified information	Inestimable Damage Position requires eligibility for access to Sensitive Compartmented Information (SCI), other intelligence-related Special Sensitive information, or involvement in Top Secret Special Access Programs) (SAP)
Unclassified information (e.g. private, controlled unclassified, or proprietary information) significant to national security	Exceptionally Grave Damage <ul style="list-style-type: none"> Unlimited 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 exceptionally grave damage to national security

Suitability

No Public Trust duties selected