

NEW

I/A: _____

MR#: BT0622

IP#: _____

CLASSIFICATION AND PERFORMANCE MANAGEMENT RECORD

- Performance Plan
- Performance Appraisal
- Performance Recognition
- Progress Review
- Position Description

Employee's Name: _____ Social Security No.: _____

Position Title: Export Compliance Specialist

Pay Plan, Series, Grade/Step: GS-1801-09

Organization: 1. BIS 4. EMCD

2. O/Asst. Secretary EA 5. _____

3. OEXS 6. _____

Rating Period: _____

Covered By: Senior Executive Service Other _____

General Workforce

PART A—POSITION DESCRIPTION

POSITION CERTIFICATION—I certify that this is an accurate statement of the major duties and responsibilities of the position and its organization relationships and that the position is necessary to carry out Government functions for which I am responsible. This certification is made with the knowledge that this information is to be used for statutory purposes relating to appointment and payment of public funds and that false or misleading statements may constitute violation of such statute or their implementing regulations.

SUPERVISOR'S SIGNATURE 	DATE <u>5/30/2019</u>	SECOND LEVEL SUPERVISOR 	DATE <u>6/4/19</u>
Thomas W. Andrukonis, Director, EMCD		Karen M. Nies-Vogel, Director, OEXS	

CLASSIFICATION CERTIFICATION	OFFICIAL TITLE: <u>Export Compliance Specialist</u>				
	PP: <u>GS</u>	SERIES: <u>1801</u>	FUNC: _____	GRADE: <u>09</u>	I/A: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

I certify that this position has been classified as required by Title 5, US Code, in conformance with standards published by the OPM or, if no published standard applies directly, consistently with the most applicable published standards.

NAME AND TITLE OF CLASSIFIER <u>Shels Marie, HR Specialist</u>	SIGNATURE 	DATE <u>8/20/19</u>
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PART B—PERFORMANCE PLAN

This plan is an accurate statement of the work that will be the basis of the employee's performance appraisal.

NAME AND TITLE OF FIRST LINE SUPERVISOR/RATING OFFICIAL	SIGNATURE	DATE

APPROVAL—I agree with the certification of the position description and approve the performance plan.

NAME AND TITLE OF APPROVING OFFICIAL OR SES APPOINTING AUTHORITY	SIGNATURE	DATE

EMPLOYEE ACKNOWLEDGEMENT—My signature acknowledges discussion of the position description and receipt of the plan, and does not necessarily signify agreement.	SIGNATURE	DATE

PRIVACY ACT STATEMENT—Disclosure of your social security number on this form is voluntary. The number is linked with your name in the official personnel records system to ensure unique identification of your records. The social security number will be used solely to ensure accurate entry of your performance rating into the automated record system.

**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-1801-09**

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 less 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, or in collaboration with senior compliance officers, 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. In collaboration with senior compliance officers, 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 document review 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 1-6, 950 pts

Knowledge and ability to apply U.S. laws which govern export controls.

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

Knowledge of international regimes that govern the export control regulations.

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 follow schedules and meet deadlines to effectively support case development efforts.

Factor 2 - Supervisory Controls

FL 2-3, 275 pts

The supervisor assigns work and provides specific instructions and generalized supervision in projects to be performed. Deadlines are established to ensure that the statutory time limits are met. The employee plans and executes assignments, seeking guidance on situations presenting external conflict and/or difficulties without clear precedent. Finished work is evaluated for soundness, accomplishment of objectives and policy/regulatory compliance.

Factor 3 - Guidelines

FL 3-3, 275 pts

Guidelines include statutes, regulations, legal and administrative precedents, agreements and established policies and procedures. The incumbent uses initiative and judgment in the interpretation of existing guidelines and, in conjunction with the supervisor, develop new guidelines for the conduct of assignments in the program area. 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.

Factor 4 - Complexity

FL 4-3, 150 pts

Work involves the analysis of less complex issues and programs which may consist of diverse steps and processes which require analysis of complex information and selection among alternative approaches to assignments. Decisions must consider need to refine work methods and the reconciliation of conflicting data.

Factor 5 - Scope and Effect

FL 5-3, 150 pts

The purpose of the work is to ensure that the applicable U.S. laws, regulations and agreements are fairly and effectively enforced. Work affects the adequacy and timeliness of government regulatory and/or functions, and the overall effectiveness of the work unit in meeting objectives.

Factor 6 - Personal Contacts

FL 6 (level 2)

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 (level B) 75 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 an office setting.

Total: 1885 pts

GS-09

Career Ladder: PD# BI0623-GS-1801-11

PD# BI0624-GS-1801-12

PD# BI0625-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.

FACTOR EVALUATION SYSTEM
POSITION EVALUATION STATEMENT

Title, Series and Grade: EXPORT COMPLIANCE SPECIALIST (GS-1801-09)

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	950	FL 1-6
2. Supervisory Control	275	FL 2-3
3. Guidelines	275	FL 3-3
4. Complexity	150	FL 4-3
5. Scope and Effect	150	FL 5-3
6. Personal Contacts/ 7. Purpose of Contacts	75	FL 6/2; 7B
8. Physical Demands	5	FL 8-1
9. Work Environment	5	FL 9-1
Total Points	1885	
Grade Conversion: GS-09		

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>9</i>
Band	
Position Description	BI <i>0022</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

Form Required

T5

SF 86

Sensitivity

Non-Critical Sensitive

Risk Level

High Risk

Signature: Kathleen Barfield

Date: 8/7/19

Name: Kathleen Barfield