

NEW

I/A:

MR#:

IP#:

## CLASSIFICATION AND PERFORMANCE MANAGEMENT RECORD

1870624

- 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-1801-12

- Organization:
- |                                |                |
|--------------------------------|----------------|
| 1. <u>BIS</u>                  | 4. <u>EMCD</u> |
| 2. <u>O/Asst. Secretary EA</u> | 5. _____       |
| 3. <u>OEXS</u>                 | 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 <u>Thomas W. Andrukonis</u>	DATE <u>5/30/2019</u>	SECOND LEVEL SUPERVISOR <u>Karen H. Nies-Vogel</u>	DATE <u>6/6/19</u>
Thomas W. Andrukonis, Director, EMCD		Karen H. Nies-Vogel, Director, OEXS	

<b>CLASSIFICATION CERTIFICATION</b>	OFFICIAL TITLE: <u>Export Compliance Specialist</u>			
	PP. <u>GS</u>	SERIES: <u>1801</u>	FUNC. _____	GRADE: <u>12</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>Sheldon D. Moore, HR Specialist</u>	SIGNATURE <u>Sheldon D. Moore</u>	DATE <u>8/20/19</u>
--	--------------------------------------	------------------------

### 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.

# MASTER RECORD/INDIVIDUAL POSITION DATA

A. KEY DATA					
1. FUNCTION (1) <small>A/C/D/N/R</small>	2. DEPT. CD/AGCY-BUR CD (4) <b>CM67</b>	3. SON (4) <b>1426</b>	4. MR NO (6) <b>B70624</b>	5. GRADE (2) <b>12</b>	6. IP NO (8)

B. MASTER RECORD																							
1. PAY PLAN (2) <b>GS</b>		2. OCC SER (4) <b>1801</b>		3. OCC FUNC CD (2)		4. OFF TLE-PF/CD/SF (6) <small>PFIX TITLE CD SFIX</small> <b>0012</b>		5. OFF TITLE (38) (32 W/ PF OR SF) (26 W/ PF AND SF) <b>Export Compliance Specialist</b>															
6. HQ/FLD CD (1) <b>1</b> <small>1=HQ 2=FLD</small>		7. SUPV CD (1) <b>8</b> <small>1=SUPV SGE 2=SUPV GSSG 3=MGR SGE 4=SUPV CSRA</small>		5=MGT CSRA 6=LDR LGE 8=ALL OTHERS		8. CLASS STD CD (1) <small>X=NEW STD BLANK=N/A</small>		9. INTERDIS CD (1) <b>N</b> <small>N=NO Y=INTERDIS</small>		10. DATE CLASS (6) <table style="width: 100%;"><tr><td style="width: 33%;"><b>08</b></td><td style="width: 33%;"><b>20</b></td><td style="width: 33%;"><b>19</b></td></tr><tr><td style="text-align: center;"><small>MO</small></td><td style="text-align: center;"><small>DAY</small></td><td style="text-align: center;"><small>YEAR</small></td></tr></table>		<b>08</b>	<b>20</b>	<b>19</b>	<small>MO</small>	<small>DAY</small>	<small>YEAR</small>						
<b>08</b>	<b>20</b>	<b>19</b>																					
<small>MO</small>	<small>DAY</small>	<small>YEAR</small>																					
11. EARLY RET CD (1) <small>1=PRIMARY 2=SECONDARY</small>			12. INACT/ACT (1) <b>A</b> <small>A=ACTIVE I=INACTIVE</small>		13. DT ABOL (6) <small>MO DAY YEAR</small>			14. DT INACT/REACT (6) <small>MO DAY YEAR</small>			15. AGCY USE (10)												
16. INTERDIS SERIES (40) <table style="width: 100%;"><tr><td>(4)</td><td>(4)</td><td>(4)</td><td>(4)</td><td>(4)</td><td>(4)</td><td>(4)</td><td>(4)</td><td>(4)</td><td>(4)</td><td>(4)</td><td>(4)</td></tr></table>												(4)	(4)	(4)	(4)	(4)	(4)	(4)	(4)	(4)	(4)	(4)	(4)
(4)	(4)	(4)	(4)	(4)	(4)	(4)	(4)	(4)	(4)	(4)	(4)												
17. INTERDIS-PF/CD/SF (60) (32 W/ PF OR SF) (26 W/ PF AND SF) <table style="width: 100%;"><tr><td>(6)</td><td>(6)</td><td>(6)</td><td>(6)</td><td>(6)</td><td>(6)</td><td>(6)</td><td>(6)</td><td>(6)</td><td>(6)</td><td>(6)</td><td>(6)</td></tr></table>												(6)	(6)	(6)	(6)	(6)	(6)	(6)	(6)	(6)	(6)	(6)	(6)
(6)	(6)	(6)	(6)	(6)	(6)	(6)	(6)	(6)	(6)	(6)	(6)												

C. INDIVIDUAL POSITION																																										
1. FLSA (1) <b>E</b> <small>E=EXEMPT N=NONEXEMPT</small>		PAY TBL (6)		2. FIN DS (1) <b>0</b> <small>0=NONE 3=SF-278 4=SF-450</small>		PROC INTG (1) <small>Y=YES N=NO</small>		3. POS SCHED (1) <small>A=SCH D=EXCEPTED B=SCH BUT NOT C=SCH A.B.C</small>		3A. CYBER SECURITY (9) <b>000</b>		4. POS SENS (2) <b>2:N</b> <small>1=LOW RIS 2=NONCRIT/SEN 3=CRIT/SENS 4=SPECIAL SENS 5=MOD RISK 6=HIGH RISK</small>		4A. DRUG TS (1) <b>Y</b>		5. COMP LVL (4) <b>0001</b>																										
6. WK TITLE CD (4)			7. WK TITLE (38) <b>Export Compliance Specialist</b>										8. ORG STR CD (18) <table style="width: 100%;"><tr><td>(1st)</td><td>(2nd)</td><td>(3rd)</td><td>(4th)</td><td>(5th)</td><td>(6th)</td><td>(7th)</td><td>(8th)</td></tr><tr><td><b>67</b></td><td><b>44</b></td><td><b>40</b></td><td><b>0002</b></td><td><b>00</b></td><td><b>00</b></td><td><b>00</b></td><td><b>00</b></td></tr></table>		(1st)	(2nd)	(3rd)	(4th)	(5th)	(6th)	(7th)	(8th)	<b>67</b>	<b>44</b>	<b>40</b>	<b>0002</b>	<b>00</b>	<b>00</b>	<b>00</b>	<b>00</b>	9. VAC REV CD (1) <small>D=POSN ACTION NO VACANCY A=NO CHANGE</small>			B=LOWER GRADE C=HIGHER GRADE			D=DIFFERENT TITLE AND/OR SERIES E=NEW POSN/NEW FTE			9A. TELEWORK <b>Y</b> <small>YES - POSITION ELIGIBLE NO - POSITION NOT ELIGIBLE</small>		
(1st)	(2nd)	(3rd)	(4th)	(5th)	(6th)	(7th)	(8th)																																			
<b>67</b>	<b>44</b>	<b>40</b>	<b>0002</b>	<b>00</b>	<b>00</b>	<b>00</b>	<b>00</b>																																			
10. TARGET GRADE (2) <b>13</b>		11. LANG REQ (2)		12. PROJ DUTY IND (1) <small>BLANK=N/A Y=YES</small>		13. DUTY STATION (9) <small>ST (2) CITY (4) CNTY (3)</small> <b>11 0010 01</b>			14. BUS CD (4) <b>7777</b>		15. DT LST AUDIT (6) <small>MO DAY YEAR</small>		16. PAS IND/LEO (1) <small>BLANK=N/A 1=PAS A=LEO</small>		17. DATE-EST (8) <small>MO DAY YEAR</small>																											
18. GRADE BASIS IND (1) <small>1=REV WHEN VACANT 2=IMPACT OF PERSON 3=SUP/GSSG</small>						4=SUP/PROGRAM 5=RREG 6=POLICY ANAL GEG			7=EQUIP DEV GUIDE			19. DT REQUEST RECD (6) <small>MO DAY YEAR</small>			20. NTE DATE (6) <small>MO DAY YEAR</small>			21. POS ST BUD (1) <small>Y=PERM N=OTHER</small>																								
22. MAINT REV/CLASS ACT CD (2) (1ST DIGIT=ACTIVITY AND 2ND DIGIT=RESULTS) <table style="width: 100%;"><tr><td style="width: 33%;"><b>ACTIVITY</b> 1=AUDIT (COUNTED TOWARDS MAINTENANCE REVIEW) 2=OTHER ACTIVITY</td><td style="width: 33%;"><b>RESULTS</b> 1=NO ACTION REQUIRED 2=MINOR PD CHANGE 3=NEW PD REQUIRED</td><td style="width: 33%;">4=TITLE CHANGE 5=SERIES CHANGE 6=POSN UPGRADE</td><td style="width: 33%;">7=POSN DOWNGRADE 8=NEW POSN 9=OTHER</td></tr></table>																		<b>ACTIVITY</b> 1=AUDIT (COUNTED TOWARDS MAINTENANCE REVIEW) 2=OTHER ACTIVITY	<b>RESULTS</b> 1=NO ACTION REQUIRED 2=MINOR PD CHANGE 3=NEW PD REQUIRED	4=TITLE CHANGE 5=SERIES CHANGE 6=POSN UPGRADE	7=POSN DOWNGRADE 8=NEW POSN 9=OTHER																					
<b>ACTIVITY</b> 1=AUDIT (COUNTED TOWARDS MAINTENANCE REVIEW) 2=OTHER ACTIVITY	<b>RESULTS</b> 1=NO ACTION REQUIRED 2=MINOR PD CHANGE 3=NEW PD REQUIRED	4=TITLE CHANGE 5=SERIES CHANGE 6=POSN UPGRADE	7=POSN DOWNGRADE 8=NEW POSN 9=OTHER																																							
23. DATE EMP ASGN (6) <small>MO DAY YEAR</small>			24. DATE ABOL (6) <small>MO DAY YEAR</small>			25. INACT/ACT (1) <small>A=ACTIVE I=INACTIVE</small>		26. DATE INACT/REACT (6) <small>MO DAY YEAR</small>			27. ACCTG STAT (4)		28. INTASGN SER (4)		29. AGENCY USE (8)																											
30. PERSONNEL MANAGEMENT SPECIALIST'S SIGNATURE 												31. DATE <b>8/20/19</b>																														
32. REMARKS <b>B70625-68-13</b>  <b>Reports to: 15209310 (Thomas Andrukenis)</b>																																										

**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.

<b>Evaluation Factors</b>	<b>Points Assigned</b>	<b>Standard Used (Factor Level)</b>
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	<b>2790</b>	
Grade Conversion: <b>GS-12</b>		

*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**

**Form Required**

T5

SF 86

**Sensitivity**

Non-Critical Sensitive

**Risk Level**

High Risk

Signature: Kathleen Barfield

Date: 8/7/19

Name: Kathleen Barfield