

NEW

I/A:

MR#:

IP#:

CLASSIFICATION AND PERFORMANCE MANAGEMENT RECORD

070625

- 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-1801-13

- 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>T.W. Andrukonis</u> Thomas W. Andrukonis, Director, EMCD	DATE <u>5/30/2019</u>	SECOND LEVEL SUPERVISOR <u>Karen H. Nies-Vogel</u> Karen H. Nies-Vogel, Director, OEXS	DATE <u>6/6/19</u>
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CLASSIFICATION CERTIFICATION	OFFICIAL TITLE: <u>Export Compliance Specialist</u>			
	PP <u>GS</u>	SERIES <u>1801</u>	FUNC	GRADE <u>13</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>Sheela Mune, AS Specialist</u>	SIGNATURE <u>Sheela Mune</u>	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.

MASTER RECORD/INDIVIDUAL POSITION DATA

A. KEY DATA					
1. FUNCTION (1) ACDIR	2. DEPT. CD/AGCY-BUR CD (4) CM67	3. SON (4) 1426	4. MR NO (6) 570625	5. GRADE (2) 13	6. IP NO (8)

B. MASTER RECORD											
1. PAY PLAN (2) GS		2. OCC SER (4) 1801		3. OCC FUNC CD (2)		4. OFF TLE-PF/CD/SF (6) PFIX TITLE CD SFIX 0012		5. OFF TITLE (38) (32 W/ PF OR SF) (26 W/ PF AND SF) Export Compliance Specialist			
6. HQ/FLD CD (1) 1=HQ 2=FLD 1		7. SUPV CD (1) 8 1=SUPV SGEG 2=SUPV GSSG 3=MGR SGEG 4=SUPV CSRA 5=MGT CSRA 6=LDR LGEG 8=ALL OTHERS		8. CLASS STD CD (1) X=NEW STD BLANK=N/A		9. INTERDIS CD (1) N N=NO Y=INTERDIS		10. DATE CLASS (6) MO DAY YEAR E 20 19			
11. EARLY RET CD (1) 1=PRIMARY 2=SECONDARY			12. INACT/ACT (1) A A=ACTIVE I=INACTIVE		13. DT ABOL (6) MO DAY YEAR			14. DT INACT/REACT (6) MO DAY YEAR		15. AGCY USE (10)	
16. INTERDIS SERIES (40) (4) (4) (4) (4) (4) (4) (4) (4) (4) (4)											
17. INTERDIS-PF/CD/SF (50) (32 W/ PF OR SF) (26 W/ PF AND SF) (6) (6) (6) (6) (6) (6) (6) (6) (6) (6)											

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

**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-1801-13**

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

As a full performing specialist, is responsible for above-average 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. 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. Assists junior compliance officers in their investigations provides guidance with respect to regulatory requirements.
3. Independently prepares and reviews junior analysts' written products to inform customers of findings and/or recommendations for actions.

4. Assists colleagues in more complex investigations conducts research; develops investigative materials; assists in document review and case-file organization; recommends further action.
5. Effectively expresses ideas both orally and in writing to senior compliance officers, special agents, leadership, and representatives within the interagency.

III. FACTOR LEVELS

Factor I - Knowledge Required by the Position

FL 1-8, 1550 pts

Demonstrated knowledge of the U.S. laws, regulations, acts, executive orders and agreements which govern the investigative and/or compliance and/or federal law enforcement operations and information needs for which the employee is responsible.

Demonstrated knowledge of where and how to find/obtain a wide range of all-source information—including but not limited to intelligence, government-privileged, foreign government, and private and public—and methods, principles, and practices to record, analyze, and retain it and to properly disseminate it within and outside of BIS.

Demonstrated ability to effectively assess threats to national security and identify risk inherent export transactions based on an understanding of potential military or terrorist applications of sensitive U.S. technologies and the potential consequences of their use by illicit end-users.

Applied experience in crafting written recommendations for the identification of parties as investigative leads for law enforcement officials, overseas subjects for end-use check verification visits, and targets for administrative sanction based on export control violations or acting contrary to U.S. national security or foreign policy interests.

Demonstrated 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.

Advanced assistance with development and implementation of significant new program strategies and analyze key policy questions in the program area and contributes to significant agency decisions.

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 enforcement, 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 4-5, 325 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 diverse and numerous unusual circumstances, need to refine work methods, and reconciliation of conflicting data.

Factor 5 - Scope and Effect

FL 5-5, 325 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: 3290 pts

Grade: GS-13

This position is at the full promotion level.

IV. UNIQUE POSITION REQUIREMENTS

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

Drug Testing: The incumbent of this position must successfully pass a urinalysis screening for illegal drug use prior to appointment and periodically thereafter. The incumbent of this position is subject to random drug testing.

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-1801-13)

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	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/ 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	3290	
Grade Conversion: GS-13		

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 Band	GS-1801-13
Position Description Number	BI 06025
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

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

Degree of Potential for Compromise or Damage

- 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