

Administrative Elements Introduction

Certain principles have been developed to assist companies in the establishment of an administrative structure for their export management system. Without operational implementation and maintenance of each of these, an EMS cannot remain solid and reliable. Each of these principles is considered a link in the chain. One weak link can create a vulnerability that could negatively impact the entire system. These principles are referred to as “Administrative Elements” in the Guidelines and include:

1. Management Commitment
2. Responsible Personnel
3. Record keeping
4. Training
5. Internal Reviews
6. Notification

The content of these elements can be easily incorporated into a company’s existing office procedures. Such elements help establish a concept that export control issues play an important role in a company’s day-to-day operations.

Throughout each of the EMS elements, the importance of “documentation” is stressed. The purpose of the principle of “documentation” is to provide a method of assurance that the system and procedures are being maintained according to established company procedures and consistent with the Export Administration Regulations (EAR). If your company is moving toward a paperless environment, “documentation” may need to evolve into other methods of assurance. As you think about what those other methods might be, consider [Part 762.5](#) of the EAR, where it describes acceptable records.