

Negotiating the ITAR Minefield through Use of Best Practices

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- **Alliant Techsystems Inc (ATK) is headquartered in Minneapolis, MN**
- **ATK is a premier aerospace and defense company with more than 17,000 employees in 21 states and \$4.6 billion in revenue. News and information can be found on the Internet at <http://www.atk.com/>.**
- **Structure: Three Business Units (Groups)**
 - Armament Systems Group (Military/Commercial Ammo)
 - Missions Systems Group (Composite Structures/High Tech Weapons)
 - Space Systems Group (Launch Division/Spacecraft Division)
- **Majority of products fall on the U.S. Munitions List; therefore, export of such products fall under the ITAR**
- **Each Group and Facility has their own Export/Import Control Officer (EICO)**

- **Globally**
 - It starts at the top with top management
 - ATK's President and CEO, Dan Murphy, has issued his management commitment to export and import control to the entire company
- **Vertically**
 - Management commitment from the top flows **DOWN** through the organization to every employee
- **Horizontally**
 - Management commitment from the top flows **ACROSS** all functions

“DOCUMENT WHAT YOU DO – DO WHAT YOU DOCUMENT”

- **U.S. Government “expects” to see Policies, Procedures and Processes when they come to visit**
- **Corporate Policies & Procedures**
 - Usually “top level” – do not contain a lot of detail
 - Requires Business Units to create their own procedures and processes to incorporate Corporate requirements
 - If particular procedure is “standard” for entire company, may contain more detail (e.g., foreign travel procedure outlines procedure that **MUST** be followed by all employees – does not change at Business Unit level)
- **Business Unit Procedures**
 - Implementation of Corporate Policy and Procedure “flow down”
 - More detailed than Corporate; designates tasks to specific departments

- **Organization Processes**
 - Within ATK, these are called OOs (Organization Operating Instructions)
 - Very detailed – organization specific
 - Gets into the minutiae of who does what, and why, and how and when
- All levels of Export/Import Control personnel need to work as a team
 - All lower tier procedures and processes should be reviewed by the next higher level to insure all levels coordinate and complement each other

REMEMBER:

“DOCUMENT WHAT YOU DO – DO WHAT YOU DOCUMENT!!”

Management:

✓ May require some one-on-one time to ensure management is aware and committed to Export/Import Control

Employees:

✓ Initial – New Hire Orientation

✓ Yearly –

✓ Computer-Based “General Awareness” Training

✓ Functional-Specific Training (live face-to-face training)

✓ Ongoing –

✓ May need face-to-face training on an “as needed” basis (e.g., if particular group has consistent violations)

✓ Embed training in day-to-day workplace – posters, e-mails, reminder stickers, badge lanyards

EICO:

- ✓ **Initial – “Hopefully” company will hire person with Export/Import Control background**
- ✓ **Yearly – In addition to above-listed “Employee” training, at least one DOC and one DOS training class (e.g., SIA, ACI, DOC Update, Partnering for Compliance, etc.)**
- ✓ **Ongoing – Interaction with other EICOs and corporate staff; internal “staff” training at least yearly**
- ✓ **Certification – Highly recommended (e.g., IIEI)**

COMMITMENT: Management is not “against” Export/Import Control – they may just not understand the requirements – teach them – get them on board

POLICIES, PROCEDURES AND PROCESSES: Document your policies, procedures and processes somewhere that EVERYONE can find them – including the Government if they decide to come knocking on your door

CRITICAL: Keep them CURRENT...

TRAINING:

Keep management engaged in order to have enough BUDGET for training

Keep personnel engaged and make export/import compliance a TEAM effort

The regulations change; the EICO must stay up-to-date with current information through training

➤ Setting up and following a set of BEST PRACTICES is a recipe for SUCCESS!



➤ NOT setting up and following a set of BEST PRACTICES is a recipe for DISASTER!



If you have any questions or would like to discuss an issue, feel free to call me or e-mail me:

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