Instructions for the Line Office/Staff Office (LO/SO) Quarterly Export Control Report

At the end of each quarter, designated Export Control Points of Accountability (POAs) in each **LO/SO** must submit to the LO/SO Controlled Technology Coordinator (CTC) the documents described below. The CTC will consolidate individual program office and facility documents into one LO/SO report for submission to NOAA Office of the Chief Administrative Officer (OCAO). The documents satisfy the oversight and monitoring requirements defined in NOAA Administrative Order (NAO) 207-12 "Technology Controls and Foreign National Access" (http://deemedexports.noaa.gov/) and demonstrate that all LO/SO controlled technology has been identified and is protected from improper/unlicensed access by foreign nationals working in LO/SO facilities and with LO/SO programs (even if outside a physical NOAA facility). Completion of this Quarterly export control report for each of LO/SO facility and program is one of the routine duties for LO/SO POAs. Additional duties are described in the PAO Roles and Responsibilities document
located http://deemedexports.noaa.gov/roles_&_responsibilities/index.html .

The general objective of the NAO is to:

1) Identify and track locations of NOAA controlled technology (CT) and how the CT is protected by responsible LO/SO officials;
2) Identify and track all foreign national guests who access NOAA facilities and NOAA programs;
3) Maintain a written plan describing how the two are being kept apart, both at the facility level (Access Control Plan) and at the individual controlled item level (Access Control Information Sheet for specific CT)

These instructions describe the required documents and how to complete them. They also contain standard templates for LO/SO use. More information can be found at http://deemedexports.noaa.gov/inventory_submission_requirements/ .

The Quarterly documents must be submitted to the CTC no later than the last day of the quarter, or at an earlier date specified by the CTC. It is important to submit timely and accurate documents since the CTC/Deputy CTC need time to review and correct any deficiencies (in coordination with the POAs) and to assemble the comprehensive LO/SO report before the NOAA due date (typically 3-4 weeks after the end of the quarter). The fewer errors on the POA submission means quicker completion of the LO/SO report and less time needed to resolve any problems.

Certification Form

This form should be completed, signed, scanned, and submitted each quarter.

Controlled Technology Inventory (CTI)- The CTI satisfies #1 above

The CTI is an Excel spreadsheet that lists all controlled technology located in a LO/SO and includes details for the items. The standard template is available at the above web link and an updated CTI with must be submitted each quarter. Add or subtract items as necessary from the CTI provided the previous quarter. If the number of controlled items is large (e.g., electronic documents too numerous and unwieldy to list individually), then those items can be combined into broad categories and listed in the CTI as long as they are similar items (e.g., ITAR e-docs on GOES-R PDRR) and are stored in an identical location. In any event, they must still be properly protected as if they had been listed individually….the protections should not be any different.

If there is no controlled technology at the facility, explicitly state so in the spreadsheet. Update the submission date to a current date and provide the original electronic XLS spreadsheet, not XLSX, PDF or any other file formats.

POAs should remind staff (via e-mail or at office all-hands meetings) that everyone must report all controlled technology that may have come in to their possession recently. If POAs do not perform occasional outreach, there may be consequences when LO/SO controlled items are illegally found in the possession of FNs in their office. This has happened at NOAA and resulted in a NOAA federal ITAR violation. All POAs must identify all controlled technology items in their offices to prevent future violations.

Foreign National (FN) Guest List (FN List) – The FN list satisfies #2 above.

The updated FN spreadsheet must be submitted each quarter and This Excel spreadsheet must list all FN guests who have been sponsored by the LO/SO since the start of the fiscal year (Oct. 1) and includes details such as planned start and departure dates. The standard template is available at the above web link. Remove any FN names that have left before the start of the fiscal year (FY). This is a cumulative list for the current FY; therefore, retain in the spreadsheet all FN guests who have been sponsored during the FY, even if they have left. After the start of the new FY, remove FNs on the list who have left. If there are/were no FNs at your facility, state this on the spreadsheet. Though it is not required, POAs who track FN visitors should note that the start/end dates will be less than 4 days and will identify the FN as a Visitor, not Guest. **Update the submission date at the top of the FN List**. Please submit the original electronic XLS spreadsheet, not XLSX, PDF, or other file formats.

Please review the annual renewal dates for long-term FNs and remind the federal

Department Sponsor/NOAA (DSN) to submit renewal forms at least 30 days before expiration. If the DSN intends to have the FN stay beyond one year**, do not let the end date arrive** without completing the annual renewal forms. Submit the renewal forms to the CTC at least 30 days before that end date as the FN may be asked to work off-site until the authorization is resolved by the DSN. An on-site FN guest with expired approval is a NOAA policy violation and must investigated by NESDIS and NOAA. This takes additional time for everyone involved.

If there were FNs who were pre-approved to come to your facility (through the required Endorsement Supplement Form/Appendix B) but who canceled before arrival, please explicitly provide the CTC the names so the CTC can update the LO/SO records. The FN list should specify "canceled visit" next to the FN name. Alternatively, FNs who were endorsed by NOAA-OCAO (and who actually arrived) but who do not appear on your quarterly spreadsheet will raise a red flag during audits and must be corrected. Make sure all FN guests who access your facility/program are documented on the FN list.

The CTC will review the FN spreadsheets each quarter to ensure: 1) that all FNs who appear on the FN list have been endorsed/pre-approved (i.e., signed Appendix B and Endorsement Supplement Form), and 2) that all pre-approved/endorsed FNs are on your FN list. *It is important for all POAs to maintain an accurate FN list since errors discovered by the CTC during review always delay the report and take a significant amount of time to resolve once they are discovered.* 99% of all errors found by the CTC in quarterly submissions are related to careless FN documentation errors.

Access Control Plan (ACP) and Access Control Information Sheets (ACIS) – Satisfies #3 above.

The ACP and ACISs describe how controlled technology is being protected from improper FN access at your facility. They are Word files, and templates and guidance are available at http://deemedexports.noaa.gov/access_control_plans/index.html .

The ACP describes, in general, how your facility is protected from improper release of controlled technology (e.g. facility access controls in place such as storing controlled technology behind locked doors or cabinets or on firewall-protected computers).

The ACIS must be completed by the responsible official for the controlled item and includes item-specific details such as: what the item is, whether it's controlled by ITAR or EAR, where it's located, how it's being protected by the owner, and who is responsible to protect it (i.e., owner information). The template of this electronic document is maintained by the CTC and provided by the POA to owners of controlled technology. Once the item owner completes the document, the POA reviews it for

accuracy and completeness and then appends it with the other completed ACISs in the facility to the end of the ACP. If you have no controlled technology at your facility, then you do not need to submit the ACIS form. However, in all cases, at least the ACP must be submitted at the frequency described next.

There are only two occasions when the ACP and ACISs must be submitted with the quarterly report: 1) once a year at the end of every 4th quarter (not needed for quarters 1, 2, or 3), or 2) if the documents have been updated at any other quarter of the year. On these occasions, please update them, including an updated submission date, and send it with your quarterly submission (even if unchanged in the 4th quarter). Please submit the original electronic Word version of these documents, not PDF or any other file formats.

If there are questions on these instructions, please review the NOAA Deemed Exports site (http://deemedexports.noaa.gov/) or contact the LO/SO CTC for further guidance.