



# Directorate of Defense Trade Controls Company Visit Program (CVP)

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# CVP Overview



- Administered by the Office of Defense Trade Controls Compliance (DTCC)
- Visits by Directorate of Defense Trade Controls (DDTC) officials to U.S. entities registered with DDTC as manufacturers, exporters, or brokers of defense articles and defense services, as well as others involved in ITAR-regulated activities, to include foreign companies and foreign governments.



# CVP Goals



1. Advance DDTC's understanding of how different entities establish and maintain an overall defense trade control program to fit the needs of their business (e.g., entity size, technology, customers, types of export authorizations, business changes in response to ECR or regulation updates)
2. Allow DTCC to review entity defense trade compliance programs in the context of a consent agreement (CA) or adjudication of a voluntary disclosure (VD), directed disclosure (DD), or another compliance matter
3. Gather information to support the Directorate's development of regulatory policy and practice
4. For DTCC to assess and disseminate industry best practices, recommendations, and trends to benefit compliance programs and increase transparency



# CVP Overview



## Site visits on open dialogue and shared communication. These visits can benefit entities in several ways:

- Enhancing face-to-face contact and relationships between entities and DDTC
- Advancing DDTC's understanding of entities' operations, policies, and procedures, to include challenges and best practices
- DTCC can provide feedback on entities' compliance programs and recommendations based on industry best practices
- Garnering feedback on export control reform (ECR) and other regulatory changes
- Support the export function within the business and engage senior leadership

## These visits are not audits or inspections

- **The purpose of the visit is to understand how entities implement ITAR compliance requirements, not to evaluate compliance failures or violations**
- Visits provide DTCC with an understanding of an entity's overall compliance approach
- Visits do not produce a grade or pass/fail assessment for internal or external use, and generally do not include review of transactional records



# How Entities are Selected



- DTCC works to select entities based on CVP's goals
- DTCC examines the perceived effectiveness of the entity's compliance program
  - Can insights from the program contribute to our understanding of industry best practices and challenges?
  - Can the visit give DTCC an opportunity to help improve an entity's compliance program through education and sharing of best practices?
- DTCC takes a variety of factors into account when selecting entities to visit, including but not limited to:
  - Type and sensitivity of technology
  - Nature of business
  - Volume of licensed/regulated activity
  - Experience conducting ITAR activities
  - Geographic location (and other DDTC travel requirements)
  - Recommendations from DTCP and DTCL
  - Follow-up to a disclosure of an ITAR violation
  - Monitoring of a consent agreement
- **DTCC will make clear the purpose of our visit at the time of our initial communication**



# Pre-Visit Activity



- DTCC contacts entity by phone to discuss visit objectives, entity's willingness to participate, and potential visit dates
- DTCC sends the entity a formal visit notification letter
- The entity should provide pre-visit information including but not limited to:
  - Pre-visit questionnaire
  - Export compliance manual and/or policies and procedures
  - Organizational chart
  - Overview of ITAR controlled programs at the facility
- DTCC reviews the information prior to the visit to gain a better understanding of the entity's compliance program and related activities
- DTCC works with the entity to identify persons that the visit team should meet with and to develop the visit agenda



# Site Visit



- DDTC's team is typically composed of 2-4 people and may include personnel from Licensing, Policy, and Compliance
- Visits generally last between 1-3 days per site, depending on the size of the company
- DDTC begins the visit with the entity's senior management officials to introduce team members, discuss the objectives of the visit, and answer initial questions
- The entity should provide an overview presentation of their ITAR activities and compliance program at the start of the visit
- DDTC meets with operations personnel in various departments who have first-hand knowledge of day-to-day procedures and implementation of compliance policies
- At the conclusion of the visit DDTC personnel conduct a post-briefing with senior management and export control staff to review the information the team has gathered
- Entities are strongly encouraged to provide feedback, ask questions, and raise concerns for follow-up



# Post-Visit Activity



- DTCC is available following the visit to address feedback, questions, or concerns
- DTCC provides the entity a close-out letter that:
  - Summarizes observations
  - Discusses key initiatives taken by the entity in response to regulation changes
  - Notes strong compliance practices
  - Recommends areas for improvement
  - Addresses feedback, questions, or concerns raised by the entity
- Visits do not produce a grade or pass/fail assessment for internal or external use



# Conclusion



To summarize, we want to partner with companies, universities, and all other ITAR engaged entities to:

- Have a robust compliance program to prevent ITAR violations and protect our national security
- Build strong relationships
- Help them operate as efficiently as possible and be successful in all their defense related activities
- Help them be as competitive as possible
- Learn from one another on best practices and ways to improve
- Share knowledge gained from various outreaches and spread good practices



# Request CVP



## How To Request CVP at your workplace

- To ensure full consideration and help us make optimal selections, please email your request to [DDTC-CVP@state.gov](mailto:DDTC-CVP@state.gov) and include the below information. Please note, DDTC cannot guarantee your company will be selected for a visit.  
Email: [DDTC-CVP@state.gov](mailto:DDTC-CVP@state.gov).
- Please include the following information in your email request:
  - Entity name and subsidiary or business unit, if applicable;
  - Point of Contact and job title;
  - Facility or locations(s) requested for visit;
  - Products and/or services regulated by the ITAR;
  - Specific areas you would like DDTC to focus on or discuss during the visit; and
  - Any other relevant information.



# Contact Information



- For all other matters, including substantive questions and inquiries regarding registration submittal or status and referrals, contact the **DDTC Response Team**
  - Phone number: (202) 663-1282
  - E-mail: [DDTCCustomerService@state.gov](mailto:DDTCCustomerService@state.gov)
- For general information, please visit DDTC's website
  - <http://www.pmdrtc.state.gov/>