**Self-Assessment Checklist**[[1]](#endnote-1)

**ELEMENT # 6: Training and Education**

Within the self-assessment columns, “Y/N/U” stands for Yes/No/Uncertain or Indeterminate.

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| --- | --- | --- | --- | --- |
| **ELEMENT 6: Training and Education** | **Y** | **N** | **U** | **Initials \_\_\_\_\_\_ Date \_\_\_\_\_\_\_\_\_\_\_\_ Comments** |
| Are there written procedures that describe an ongoing program of STC compliance training and education? |  |  |  |  |
| Do the written procedures clearly describe detailed step-by-step processes that employees are expected to follow? |  |  |  |  |
| Is a qualified individual designated to conduct training and to update the training materials?  (Note in comments the name of the person.) |  |  |  |  |
| If the primary responsible person is unable to perform the responsibilities, is a secondary person designated to back-up the primary designee?  (If not, is a procedure in place to eliminate vulnerabilities of an untrained person proceeding with tasks that might lead to a compliance violation?) |  |  |  |  |
| Is there a schedule to conduct training (including date, time, and place)? |  |  |  |  |
| Does the training component of the ICP include what training materials are used (classroom module, videos, and manuals)? |  |  |  |  |
| Are training materials accurate, consistent and current with operational policy, procedures and processes?  (If not, note in the comments section what corrective actions are needed.) |  |  |  |  |
| Are attendance logs used for documentation which includes agenda, date, trainer, trainees, and subjects? |  |  |  |  |
| Is frequency of training defined? |  |  |  |  |
| Is a list of employees/positions defined who should receive strategic trade control/compliance training? |  |  |  |  |
| Are responsible persons trained to understand the interconnection of their roles with other ICP processes and where they fit in the overall program? |  |  |  |  |
| Is the list of employees/positions to be trained consistent with other Elements? |  |  |  |  |
| Is a person identified and responsible for keeping the training records? |  |  |  |  |
| Is the location of where these training records are to be maintained included? |  |  |  |  |
| Is the format of how these training records will be maintained noted? |  |  |  |  |
| Do training methods include:   * Orientation for new employees? * Formal (structured setting, agenda, modules used)? * Informal (less structured basis, verbal, daily, on- the-job exchanges)? * Circulation of written memoranda and e-mails to a small number of personnel, (usually group specific instruction)? * Refresher courses and update sessions scheduled? * Employee desk procedure manuals? * • Back-up personnel training? |  |  |  |  |
| Does content of training materials include:   * Organizational structure of STC compliance-related departments and functions? * Message of management commitment - Policy Statement * The role of the Chief Compliance Officer/ and key empowered compliance officials? * Re-export regulatory requirements? * ICP operating procedures? * The purpose and scope of STC? * Licenses & Conditions/License Exceptions & parameters? * Regulatory changes and new requirements? * Destination restrictions? * Item restrictions? * End-Use and End-User Prohibitions? * How to perform and “document” screens and checklists? * Various process flows for each element? * New customer review procedures? * Identification and description of non-compliance? |  |  |  |  |
|  |  |  |  |  |
| **Determination:** |  |  |  |  |

1. Adapted and modified from: “Compliance Guidelines: How to Build an Effective Export Management and Compliance Program and Manual,” U.S. Department of Commerce, Bureau of Industry and Security (BIS), Office of Exporter Services, Export Management and Compliance Division, November 2013, <http://www.bis.doc.gov/index.php/forms-documents/doc\_view/7-compliance-guidelines>. [↑](#endnote-ref-1)