



Norman Quality Tools

ITAR Compliance Kit

SAMPLE PREVIEW

Compliance program manual, technology control plan, DDTC registration checklist, export decision log, training slides and attendance record — now with a worked example and an implementation guide.

What's inside
01 Compliance Program Manual — program structure
02 Technology Control Plan — access control for technical data
03 DDTC Registration Checklist — registration prep
04 Export Decision Log — jurisdiction, screening, authorizations
05 Awareness Training Slides — staff training
06 Training Outline & Attendance — training records
Examples/ — filled-in worked example (fictional company)
Implementation Guide — order of steps, RACI, time estimates, 30/60/90 plan, audit-prep checklist, auditor findings, FAQ

Example note: The DSP-5 licence EXAMPLE-LIC-0001, its values and its consignee are fictional and this is not a model license application. Real licences are issued by DDTC; record your actual authorization number and provisos.

Example note: The Canada export is shown under a DSP-5 for illustration only. Some exports to Canada may qualify for the exemption at 22 CFR 126.5; whether it applies is a decision for your Empowered Official and export counsel, not this kit.

Templates, not legal advice.

Pages that follow are excerpts. Example pages show fictional data.

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ITAR Compliance Kit: Implementation Guide

Step-by-step rollout for a small shop (about 10–50 people). Replaces the former Start Here README.

Doc no.	Rev	Date	Approved by
NQT-ITAR-00	A	2026-10	_____

Templates, not legal advice. Clause and section numbers are cited for navigation only; this guide paraphrases and does not reproduce any standard. Buy the standard from its publisher and confirm requirements against your licensed copy, contract and customer flow-downs.

Status note: ITAR (22 CFR 120–130) is administered by DDTC. Jurisdiction and classification decisions belong to qualified people and counsel; this kit organizes records only. Have export counsel review your program.

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1. What is in this kit

File	Use it for
01 Compliance Program Manual	program structure
02 Technology Control Plan	access control for technical data
03 DDTC Registration Checklist	registration prep
04 Export Decision Log	jurisdiction, screening, authorizations
05 Awareness Training Slides	staff training
06 Training Outline & Attendance	training records

2. Order of steps

Step	What to do	Kit file	Clause / ref.	Est. time (small shop)
1	Appoint an Empowered Official; set program owner and scope	01 §1–2	22 CFR 120.67	2–3 h
2	Register with DDTC if you manufacture/export defense articles	03	22 CFR 122	4–8 h
3	Log jurisdiction/classification for each part, drawing and service	04 Jurisdiction Log	22 CFR 120.11, 121	8–16 h
4	Write the Technology Control Plan; badge, IT and visitor controls	02	22 CFR 120.50–56	8–12 h
5	Screen all parties; set re-screen cadence	04 Screening Log	22 CFR 126.1, 127.7	3–4 h
6	Track licenses/agreements and their limits	04 Authorizations	22 CFR 123–124	2–4 h
7	Train staff; keep attendance	05, 06	—	4–6 h

8	Self-audit, records retention, voluntary disclosure procedure	01	22 CFR 122.5, 127.12	6-8 h
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Total effort: About 40-70 hours over 6-10 weeks for a small manufacturer, plus counsel review time.

3. Who owns what (RACI)

R = Responsible, A = Accountable, C = Consulted, I = Informed. Rename roles to fit your org chart; one person often wears several hats.

Activity	Empowered Official	GM / Owner	Quality Mgr	IT Lead	Purchasing/Shipping
Program & EO appointment	R	A	C	I	I
DDTC registration	R	A	C	I	I
Jurisdiction log	A/R	I	C	I	C
Technology Control Plan	A	I	C	R	C
Restricted party screening	A	I	I	I	R
Licenses & agreements	A/R	C	I	I	C
Training	A	I	R	C	C
Self-audit & disclosures	A/R	C	C	C	I

EXAMPLE – FICTIO Jurisdiction & Classification Log

ITAR Compliance Kit v1, Rev A (2026-10) | Norman Quality Tools | Template, not legal advice

Part / drawing / service	Rev	Description	Customer	Jurisdiction	USML cat. / ECCN	Basis (customer letter, CJ, self-class.)	Decided by	Date	EO approved?	Complete?
EPM-1042-A	B	Bracket, actuator (fictional)	Fictional Aero Systems Inc.	ITAR	Per customer letter	Fictional Aero Systems Inc.	Ken Albright	2026-02-13	Yes	OK
EPM-2210-B	A	Housing, sensor (fictional)	Fictional Aero Systems Inc.	EAR 600-series	9A610.x (per customer letter)	Fictional Aero Systems Inc.	Ken Albright	2026-02-21	Yes	OK
EPM-3375-C	C	Spacer, commercial (fictional)	Fictional Aero Systems Inc.	EAR99	EAR99	Fictional Aero Systems Inc.	Ken Albright	2026-02-21	Yes	OK
EPM-5521-D	D	Mount, camera (fictional)	Fictional Aero Systems Inc.	Not determined		Fictional Aero Systems Inc.			No	INCOMPLETE



EXAMPLE – FICTIONAL DATA — Example Precision Machining LLC is fictional. Names, part numbers and dates are invented to show how the form is completed.

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Document control

Doc no.	Rev	Date	Approved by
EPM-ITAR-02	B	2026-03-02	Dana Whitfield, Quality Manager

Technology Control Plan (TCP)

ITAR Compliance Kit - Document 02 - Rev A (2026-10)

1. Purpose

This Technology Control Plan (TCP) describes how Example Precision Machining LLC prevents unauthorized access to ITAR-controlled defense articles and technical data by foreign persons, including employees, visitors, and IT service providers.

Facility address	100 Example Way, Anytown, USA (fictional)	TCP owner	Dana Whitfield
Empowered Official	Ken Albright	Effective date	2026-03-02
Controlled programs / part families	EPM-1042 actuator brackets; EPM-2210 housings	Review date	2027-03-02

2. Controlled items and data

Program / part family	USML category	Data types (drawings, CAD, CNC, WI)	Where stored	Data owner
EPM-1042 actuator bracket	Per customer letter (recorded in 04 log)	Drawings, CAD models, CNC programs	GCC High SharePoint 'ITAR' library	Dana Whitfield

3. Personnel controls

- U.S. person status verified by HR before access (I-9 documents of citizenship/permanent residency; record kept). Access list maintained by TCP owner.
- Foreign person employees: no access unless a DSP-5 or other authorization covers the release. EO approves in writing.

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Document control

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EPM-ITAR-06	B	2026-03-02	Dana Whitfield, Quality Manager

ITAR Training Outline & Attendance Record

ITAR Compliance Kit - Document 06 - Rev A (2026-10)

Training matrix

Audience	Course	When	Length
All employees	ITAR awareness (slides 1-12)	At hire + annually	40 min
Engineering / programming	Technical data marking & TCP	At hire + annually	30 min
Shipping / sales / purchasing	Screening, decision log, AES, red flags	At hire + annually	45 min
IT	TCP IT controls, cloud and email rules	Annually	30 min
HR / front desk	U.S. person verification, visitors	Annually	20 min
Empowered Official	External ITAR course (e.g., seminar)	Every 2 years	1-2 days

Attendance record

Course	ITAR Awareness – annual	Date	2026-03-16
Trainer	Ken Albright (EO)	Materials version	Slides 05 rev A

Name	Department	Quiz score	Signature
Luis Ortega	Machining	90%	(signed)