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NASA Procedural Requirements

COMPLIANCE IS MANDATORY**NPR 2190.1B**
Effective Date: December 27,
2011
Expiration Date: December
27, 2016[Printable Format \(PDF\)](#)[Request Notification of Change](#) (NASA Only)**Subject: NASA Export Control Program****Responsible Office: Export Control & Interagency Liaison Division**[| TOC](#) | [Preface](#) | [Chapter1](#) | [Chapter2](#) | [Chapter3](#) | [Chapter4](#) | [Chapter5](#) | [Chapter6](#) | [Chapter7](#) | [Chapter8](#) | [AppendixA](#) | [AppendixB](#) | [AppendixC](#) | [AppendixD](#) | [AppendixE](#) | [ALL](#) |

Chapter 7. NASA Export Control Program Auditing

7.1 Purpose

The purpose of the NASA Export Control Program Annual Audit is to ensure adequacy of the overall NASA Export Control Program and verify, via sampling, that required screening and licensing procedures are regularly followed and that required documents are maintained in compliance with the requirements of the EAR and the ITAR. This includes a review to ensure that appropriate records of all exports or transfers effected in support of NASA cooperative international programs are maintained in accordance with relevant regulations and NASA policies.

7.2 Auditor Selection

In accordance with NPD 2190.1, each Center Director shall designate a qualified individual as an ECA to annually review the operation of the NASA Export Control Program at that Center during the previous calendar year. The individual selected by the Center Director to serve as the Center ECA to perform the annual audit should have received audit training and have previous auditing or inspection experience. At a minimum, the appointed auditors should have participated in an ISO 9000 internal auditor course or other comparable auditor training. Individuals without appropriate training should not be selected, except in exceptional circumstances. The HEA will transmit audit guidance to each ECA in early January of each year. Therefore, Center Directors should make ECA appointments and inform the HEA of such appointments, as early in January of each year as practicable.

7.3 Auditor Duties and Responsibilities

7.3.1 Each Export Control Auditor (ECA) shall:

- a. Understand the tasks required in performing the audit (e.g., conducting interviews, random sampling of international projects conducted at the NASA Center, reviewing policy, reviewing export and shipping documents, developing recommendations, and preparing the final report).
- b. Have access to and a basic knowledge of the ITAR, EAR, and NASA Export Control Program.
- c. Be independent, motivated, and interested in performing the Export Control Auditor function.
- d. Be available to complete the task in the time allotted.
- e. Have complete access to the data and parties involved.
- f. Audit the Center export control function, including all export control activities and major programs that engage in exports.
- g. Determine if support contractors effecting NASA IVLs, or exporting at NASA direction, comply with the relevant regulations and recordkeeping requirements.

- h. Use the Audit Module developed each year by the HEA as a tool in conducting the audit, and review export-related files; examine Center documents for effecting exports under NASA obtained export licenses; and examine a sampling of the documentation (e.g., AES/SEDs, and invoices) for other exports, paying particular attention to the items exported and the stated authority for the export.
- i. Prepare an audit report to the Center Director and CEA that includes a description of the review process undertaken, the findings, and any recommendations or suggestions for improvement. The ECA's audit report shall be provided each year as directed by the HEA.
- j. Maintain documentation supporting the audit performed.

7.4 Final Report

The CEA shall review the ECA's report and provide a written response, including concurrence, partial concurrence, or nonconcurrence with any findings and recommendations. The CEA will forward the final report, together with comments, recommendations, and actions taken or pending to the HEA 30 days from receipt of the final report each year.

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