

## **Company Visit Program**

### Frequently Asked Questions

#### **What is the Company Visit Program?**

The Company Visit Program (CVP) is administered by the Office of Defense Trade Controls Compliance within DDTC. The program involves visits by DDTC officials to U.S. companies that are registered with DDTC as manufacturers, exporters or brokers of defense articles or services.

#### **What is the purpose of the Company Visit Program?**

The purpose of the program is several-fold. First is to learn how companies have established an overall defense trade control program. Second, understand how those programs are implemented and comply with the Arms Export Control Act and the International Traffic in Arms Regulations. Third, gather information for DDTC to determine whether we are properly exercising our regulatory responsibility in licensing and compliance. Fourth, use the information gathered from visits to adjust or revise our regulations and practices accordingly.

#### **Is a visit considered an audit or inspection?**

A visit is neither an audit nor an inspection. DDTC uses the program as a learning tool to provide information on how companies comply with the law and regulations and how DDTC can better do its job as regulator thereof. In visiting companies, DDTC is also exercising its responsibility under record-keeping requirements detailed in Section 122.5(b) of the ITAR.

#### **How are companies selected for a visit?**

Companies are selected for a variety of reasons: volume of licensed activity, nature of business, type of technology, geographic location, follow-up to a disclosure of an ITAR violation or monitoring of a consent agreement.

### **How is a visit conducted and what should a company expect?**

- The company is sent a visit notification letter approximately 6-8 weeks in advance of the visit.
- The visit letter outlines material that the company is to provide in advance of the team's visit (e.g., export compliance manual, export compliance policies and procedures, organizational chart, and an overview of ITAR controlled programs at the facility).
- In consultation with the company, the CVP team establishes an agenda for the one or two day visit.
- The visit occurs on the company's premises in offices, conference rooms and tours of business operations within the facility (e.g., design, manufacture, security, IT, personnel, shipping, etc.).
- At the conclusion of the visit, the team conducts a post-visit briefing with senior management and export control staff, sharing information the team has gathered and then discussing.
- The team returns to DDTC, generates a report for DDTC management and a formal letter goes out to the company which records the matters raised in the post-visit briefing and any areas for improvement.

### **How is the team staffed?**

Teams normally consist of 2-4 staff from the Office of Defense Trade Controls Compliance. Team numbers depend upon the size of the company being visited. The team includes civil servants and contract personnel. On some visits, staff members from DDTC Licensing participate.

### **How many companies have been visited?**

More than 60 companies have been visited since the program's inception in October 2005 through September 2008. The results overall have been positive for companies and for DDTC. Companies have benefited from meeting DDTC officials, explaining their defense trade control program, discussing best practices and identifying areas for improvement. DDTC has benefited from learning first-hand how companies control and comply and using the results to better inform our regulatory practices.