I. INTRODUCTION

This position is located in the Bureau of Industry and Security (BIS), Office of the Assistant Secretary for Export Administration (EA), Office of National Security and Technology Transfer Controls (NSTTC).

The incumbent serves as an Export Policy Analyst and subject matter expert to an organization, project or team. Serves as an advisor on export control regulations and policy procedures associated with a wide range of commodities and technology under the jurisdiction of the Department of Commerce in one or more of the following areas: materials, materials processing, electronics, telecommunications, computers, information security, avionics, marine, sensors, laser, spacecraft, and navigation.

II. MAJOR DUTIES AND RESPONSIBILITIES

- Integrates U.S. industry’s economic/regulatory concerns into the Bureau’s development of regulations and the Export Administration Act.

- Represents the Bureau and the Department’s position at interagency meetings.

- Resolves outstanding interagency issues rarely involving senior Departmental officials.

- Analyzes and processes U.S. export control license applications and commodity classification requests for items that are controlled for national security reasons in accordance with the Export Administration Regulations (EAR) through the use of electronic databases.

- Reviews prior cases for license history, approvals, and denials.

- Addresses and provides guidance to the export community on export control policies and regulations for proper submission of licenses and commodity classification requests.

- Prepares papers for cases escalated to the Operating Committee (OC) and interagency and provides information and analysis of cases to interagency parties.

- Addresses complex and detailed questions from varying audiences to include peers, representatives from federal agencies or professional organizations or industries, and the general public, utilizing knowledge gleaned from Export Administration Regulations (EAR).
• Prepares analytical reports that evaluate the strategic applications of the commodities and technology in area of expertise.

• Represents the Office and/or specific division at the Operating Committee (OC) and disputes cases to reach a resolution of policy recommendations.

• Provides expert policy advice to inter- and intra-agency groups such as the Advisory Committee on Export Policy (ACEP), Interagency Policy Committee (IPC), and Wassenaar Arrangement Expert Group (WAEG) on matters pertaining to area of expertise.

• Develops and formulates, with general guidance from senior officials, regulatory policy, evaluation of proposed exports, and remediation of policy disputes between interested parties.

• Develops, revises, and writes technical portions of agency guidelines that affect industries and other government agencies.

• Authors papers and develops agency position papers. Coordinates meetings of government and industry experts to solve issues and develop proposals for the control and decontrol of dual use items.

• May attend international meetings to support the USG position on WA regime controlled items. Prepares briefing materials for senior department officials attending IPC and ACEP meetings.

• Represents the organization in outreach events as a facilitator and/or speaker.

• Completes commodity classifications, licenses, license determinations, advisory opinions, escalations, and commodity jurisdictions as well as reviews the work of other licensing officers for accuracy and consistency.

III. FACTOR LEVELS

Factor 1 – KNOWLEDGE REQUIRED FL 1-8 1,550 points

Mastery of U.S. export control regulations and policy procedures in assigned program area to make decisions or recommendations significantly changing, interpreting, or developing important public policies or programs.

Knowledge of export policy matters in dual use and sensitive military items to ensure that they are in compliance with the Export Administration Act or other relevant statutes, the Export Administration Regulations (EAR), and national security and foreign policy matters and represents the agency in export, reexport and technology transfer discussions.

Knowledge of the theories, dynamics and factors underlying the assignment area to enable authoritative
and independent handling of programs and functions.

Knowledge of the roles, responsibilities and programs of government agencies, private sector interests, and others involved in the assignment area sufficient to guide and coordinate external contributions to programs and services and to disseminate information to concerned agencies.

Ability to effectively and independently analyze, and communicate sound and authoritative recommendations on, highly complex and sensitive issues and policies.

Knowledge sufficient to serve as a recognized authority in the program or function assigned to serve as an authoritative spokesperson to outside organizations.

Strong verbal skills and writing ability, sufficient to speak and write convincingly to audiences including outside agencies and private sector representatives with divergent and conflicting views, on issues involved.

**Factor 2 – SUPERVISORY CONTROLS**

FL 2-5  650 points

The supervisor provides administrative direction with assignments in terms of broadly defined missions or functions. The employee has responsibility for independently planning, designing, and carrying out programs, projects, studies, or other work.

Results of the work are considered technically authoritative and are normally accepted without significant change. If the work should be reviewed, the review concerns such matters as fulfillment of program objectives, effect of advice and influence on the overall program, or the contribution to the advancement of technology. Recommendations for new projects and alteration of objectives usually are evaluated for such considerations as availability of funds and other resources, broad program goals, or national priorities.

**Factor 3 – GUIDELINES**

FL3-5  650 points

The employee uses guidelines such as broad policy statements, basic legislation, recent technical findings, or reports, often ambiguous in nature and requiring extensive interpretation. The employee must use judgment and ingenuity and exercises broad latitude to interpret new or revised professional standards and codes, guidelines, policy statements, or regulations.

**Factor 4 - COMPLEXITY**

FL 4-5  325 points

The work is analytical and policy-oriented, involving analyses and recommendations affecting public policy issues in the area of export control policy. Work consists of a variety of duties requiring the application of many different and unrelated processes and methods to a broad range of activities, programs or substantial-depth of analysis of controversial or high visibility issues. The employee makes decisions and executes and/or directs actions exploring, reconciling, and resolving major uncertainties, unique situations, obscure problems, or conflicting objectives typically resulting from: the abstract nature of the concepts technological developments, standards, program direction, and administrative requirements; reliance on inconclusive or variable facts or data, or rapid or continuing changes in program or work requirements; or agency objectives with unusual demands or major constraints. The employee exercises judgment and ingenuity originating new techniques,
establishing criteria, or developing new information.

Factor 5 – SCOPE AND EFFECT

Work involves isolating and defining unprecedented issues and unknown conditions; resolving critical problems; formulating and exploring new theories and phenomena; advising on new methods, approaches, and guides; or providing guidance and advice on program planning and policy-making functions covering a broad range of business and industry programs.

Work results affect the efficiency, feasibility, security, integrity, and safety of a wide range of agency activities, national security and foreign policy of the US; well-being of a substantial number of policy experts and high-level officials both within and outside the agency; and development of activities or achievement of desired outcomes for major aspects of the agency’s missions and business and industry organizations.

Factor 6 – PERSONAL CONTACTS

Contacts are with employees and management throughout the agency, government officials outside the agency in a moderately unstructured setting, and U.S. business and industry representatives involved in export policy. The employee also meets with state and local officials, foreign industry and government officials, and others in structured situations. Contacts are maintained in areas of the U.S. Government’s export control community related to area of assigned work.

Factor 7 - PURPOSE OF CONTACTS

Contacts are for the purpose of exchanging information to advise, defend, influence, motivate, persuade, negotiate and justify policy positions and bureau initiatives for national security reasons and the advancement of U.S. business and industry; and planning and coordinating interagency review of U.S. Government license applications to export U.S. origin goods that are often in dispute; as well as keeping the Export Administration Regulations current. Assignments also require active participation in conferences, negotiations, and meetings which have significant consequences in obtaining acceptance of new controls or policy issues. Exceptional tact, diplomacy, persuasion, and negotiating skills are necessary.

Factor 8 - PHYSICAL DEMANDS

Work is normally sedentary.

Factor 9 – WORK ENVIRONMENT

Work is performed in an office setting.

TOTAL: 3,790 points = GS-14 / FPL GS-14

Position is at full promotion potential.
IV. UNIQUE POSITION REQUIREMENTS

**FLSA:** This position is **exempt** from coverage under the Fair Labor Standards Act.

**Travel Requirement:** This position requires domestic and international travel to advance bureau initiatives (<15%).

**Drug Testing:** Incumbent of this position is subject to random drug testing. Incumbent must pass urinalysis testing prior to appointment and periodically thereafter.

**Financial Disclosure:** Title 5 CFR, part 2634, requires the incumbent of this position to file an Initial and annual SF-450, Confidential Financial Disclosure Report and attend annual ethics Training.

**Position Sensitivity:** This position is designated **non-critical sensitive**. Incumbent must successfully complete a background security investigation prior to appointment and must be able to obtain and retain a **SECRET** security clearance. Incumbent of the position will also be required to complete an SF-3 12, Classified Non-disclosure Agreement.
FACTOR EVALUATION SYSTEM
POSITION EVALUATION STATEMENT

**Title, Series and Grade:** Export Policy Analyst (GS-11101-14)

**Organization:** Department of Commerce, Bureau of Industry and Security, Office of the Assistant Secretary for Export Administration, Office of National Technology Transfer Controls

**Series Determination:** This position is established in the GS-11101 series using Position Classification Flysheet for Miscellaneous Administration and Program Series, TS-34 dated January 1979, since the primary work of the position is of an administrative, two-grade interval nature and that the primary work of the position is not classifiable in any other series in the Business and Industry Group. Because the position is non-supervisory, classified using OPM Introduction to Position Classification Standards TS-134 July 1995, TS-107 August 1991, Revised August 2009 and the appropriate title is Export Policy Analyst.

<table>
<thead>
<tr>
<th>Evaluation Factors</th>
<th>Points Assigned</th>
<th>Standard Used (Factor Level)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Knowledge Required</td>
<td>1550</td>
<td>FL 1-8</td>
</tr>
<tr>
<td>2. Supervisory Control</td>
<td>650</td>
<td>FL 2-5</td>
</tr>
<tr>
<td>3. Guidelines</td>
<td>650</td>
<td>FL 3-5</td>
</tr>
<tr>
<td>4. Complexity</td>
<td>325</td>
<td>FL 4-5</td>
</tr>
<tr>
<td>5. Scope and Effect</td>
<td>325</td>
<td>FL 5-5</td>
</tr>
<tr>
<td>6. Personal Contacts</td>
<td>60</td>
<td>FL 6-3</td>
</tr>
<tr>
<td>7. Purpose of Contacts</td>
<td>220</td>
<td>FL 7-4</td>
</tr>
<tr>
<td>8. Physical Demands</td>
<td>5</td>
<td>FL 8-1</td>
</tr>
<tr>
<td>9. Work Environment</td>
<td>5</td>
<td>FL 9-1</td>
</tr>
<tr>
<td><strong>Total Points</strong></td>
<td><strong>3790</strong></td>
<td></td>
</tr>
</tbody>
</table>

**Grade Conversion:** GS-14

---

Classified by: Sheila Moore, HR Specialist 02/19/2019
Position Designation Record

Agency: Bureau of Industry and Security
Position Title: Export Policy Analyst
Series and Grade/Pay: GS-1101-14
Band: BI0590
Position Description Number: BI0590
Designator's Name & Title: Kathleen Barfield, EA Program Manager

National Duties

Requires eligibility for access to classified information

Degree of Potential for Compromise or Damage

- Position requires eligibility for access to Secret, Confidential, or "L" level information

Unclassified information (e.g. private, controlled unclassified, or proprietary information)

- Limited access to and control over unclassified information, which may include private, proprietary or other controlled unclassified information, but only where the unauthorized disclosure of that information could cause significant or serious damage to national security

Potential for Compromise or Damage

Duties

Government operations – rulemaking, policy, and major program responsibility (includes regulation or policy making, directing, implementing, advising and audits)

Degree of Potential for Compromise or Damage

- Senior management official for critical government programs, the compromise of which could result in grave damage to the public's trust

https://www.opm.gov/investigations/background-investigations/position-designation-tool/pdt/ 8/7/2019
Duties

Protection of personal, private, controlled unclassified, or proprietary information—with the potential to damage the public’s trust (includes access to or processing of personal information such as that protected by the Privacy Act (PA) of 1974, exempt from disclosure under the Freedom of Information Act (FOIA), financial data, or privileged information involving the award of contracts, contractor proprietary information, etc.)

Degree of Potential for Compromise or Damage

Access and control over personal, private, proprietary, or controlled unclassified information, the unauthorized disclosure of which could negatively impact the public’s trust, through serious damage/harm to:
- The integrity or efficiency of the service
- Individuals or business entities
- Government programs or operations impacting the public’s trust

Investigation Form Required

<table>
<thead>
<tr>
<th>Investigation</th>
<th>Form Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>T5</td>
<td>SF 86</td>
</tr>
</tbody>
</table>

Sensitivity

Non-Critical Sensitive

Risk Level

High Risk

Signature: Kathleen Barfield

Date: 8/7/19

Name: Kathleen Barfield