

MPR 2190.1
REVISION A

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MARSHALL PROCEDURAL REQUIREMENTS

AS01

MSFC EXPORT CONTROL PROGRAM

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DOCUMENT HISTORY LOG

Status (Baseline/ Revision/ Change/ Revalidation/ Canceled)	Document Revision/ Change	Effective Date	Description
Baseline		12/4/2013	Document converted from MPD 2190.1 to this Procedural Requirement Document. Added MSFC Export Control Processes; Personal Property Disposal, Training, Auditing, and Violations. Added Appendix D, MSFC Records and Appendix E, MSFC' Export Control Template.
Revision	A	11/30/2017	Updated Center Director signature block; revised to reflect changes in NASA policy, terminology, processes; added reference to new NAI 2190.1, NASA EC Operations Manual; deleted obsolete MPR 1371.1 re Foreign Visits; added new MPR 1600.4 reference that replaced MPR 1371.1 to align with Agency policy; deleted content on export processes in chapter 2 that is duplicated in NPR 2190 and the new NAI 2190.1; narrowed, limited, or clarified the role/responsibilities of the CER; revised Ch. 3 Training to emphasize adhering to new EC training requirements in NAI 2190,1 Ch. 4; added acronyms; updated PSO org name to PSECO; referenced Export Control Reform (ECR) and its impacts on NASA; eliminated obsolete terms SED, STTCP and added new terms AES, ECS; established a deadline for completing mandatory CER training; added new HQ policy change on the use of license exemptions and exceptions; renamed and emphasized the requirement to develop a Center Sensitive Technologies Inventory to align with NAI 2190.1; clarified or expanded on selected roles, i.e., TO, CERs, CEA/ACEA, etc.; established a Pending status for CERs until mandatory training has been completed each year by 30 April.

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PREFACE

P.1 PURPOSE

- a. This MPR provides requirements for the implementation of NPD 2190.1, NPR 2190.1, and NAI 2190.1.
- b. This MPR establishes the MSFC Export Control Program (ECP), delegations of authority, responsibilities, processes, and procedures for exporting hardware, software, technology, technical data, and defense services outside of the United States (U.S.) or to a foreign person or entity within the U.S. as required by the Export Administration Regulations (EAR) and the International Traffic in Arms Regulations (ITAR) that are administered by the Departments of Commerce and State, respectively.

P.2 APPLICABILITY

- a. This MPR applies to Center personnel, programs, projects, and activities, including contractors and resident agencies to the extent specified in their respective contracts or agreements. (“Contractors,” for purposes of this paragraph, include contractors, grantees, Cooperative Agreement recipients, Space Act Agreement partners, or other agreement parties.)
- b. This MPR applies to the Michoud Assembly Facility.
- c. This MPR applies the following: all mandatory actions (i.e., requirements) are denoted by statements containing the term “shall.” The terms “may” or “can” denote discretionary privilege or permission, “should” denotes a good practice and is recommended, but not required, “will” denotes expected outcome, and “are/is” denotes descriptive material.
- d. This MPR applies the following: all document citations are assumed to be the latest version unless otherwise noted.

P.3 AUTHORITY

- a. Export Administration Regulations, 15 CFR Parts 730-774
- b. International Traffic in Arms Regulations, 22 CFR Parts 120-130
- c. NPD 2190.1, NASA Export Control Program
- d. NPR 2190.1, NASA Export Control Program

P.4 APPLICABLE DOCUMENTS AND FORMS

- a. NPD 2200.1, Management of NASA Scientific and Technical Information

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- b. NPD 2810.1, Security of Information Technology
- c. NPR 2210.1, Release of NASA Software
- d. NPR 2810.1, Security of Information Technology
- e. NPR 4300.1, NASA Personal Property Disposal Procedural Requirements
- f. NPR 7120.5, NASA Space Flight Program and Project Management Requirements
- g. NAII 2190.1, NASA Export Control Operations Manual
- h. MPR 2220.1, Scientific and Technical Publications
- i. MPR 6000.1, Transportation
- j. FIPS-199, Standards for Security Categorization of Federal Information and Information Systems
- k. NASA Form 1676, NASA Scientific and Technical Information (STI) Document Availability Authorization (DAA)
- l. MSFC Form 4312, Export Clearance Information Sheet (ECIS)
- m. MSFC Form 4511, SLS Data Concurrence Sheet

P.5 MEASUREMENT/VERIFICATION

Adherence to this procedural requirement document will be measured by whether exports are executed in a timely manner sufficient to meet MSFC programs, projects, and Center objectives, by the extent to which MSFC exports are compliant with the U.S. laws and regulations, and by the results of the annual Center Export Control Auditors (ECA) report.

P.6 CANCELLATION

MPR 2190.1 Baseline, MSFC Export Control Program, dated December 4, 2013.

Original signed by

Todd A. May
Director

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CHAPTER 1 RESPONSIBILITIES

1.1 General

1.1.1 The Center Director is responsible for appointing a qualified Center Export Administrator (CEA) and for ensuring all projects under the Center’s purview comply with U.S. export control laws, NASA policies, and this MPR.

1.1.2 The MSFC Exporter is ultimately responsible for ensuring their exports conform to U.S. export control laws and regulations, as delineated in the EAR and ITAR. Exports to foreign persons or entities will only be conducted in furtherance of MSFC agreements, contracts, and/or grants when 1) there is a clear mission requirement and 2) an appropriate export authorization.

1.1.3 The MSFC ECP policies and procedures are formulated by the Office of Center Operations and administered by the Protective Services and Export Control Office (PSECO).

1.2 CEA

The CEA is appointed by the Center Director and is responsible for assessing and ensuring compliance of MSFC activities with U.S. export control laws and regulations. The CEA serves as the liaison to the Headquarters Export Administrator (HEA) and staff at the Headquarters Export Control International and Interagency Liaison Division (ECIILD). NPR 2190.1, Chapter 2, identifies specific requirements and responsibilities of the CEA. CEA duties include, but are not limited to:

1.2.1 Maintaining knowledge of MSFC’s portfolio of programs, projects, and sensitive technologies and coordinating the development of and maintaining the Center Sensitive Technologies Inventory.

1.2.2 Assisting program and project managers in the planning of export milestones set forth in NPR 7120.5.

1.2.3 Providing guidance to the International Visits Coordinator (IVC), Center Export Representatives (CER), and Sponsors of foreign visits on mitigating the risk of compromise of export controlled information.

1.2.4 Assisting Center Contracting Officers (CO), Contracting Officer Representatives (CORs), and Grant Officers in procurement-related export control matters.

1.2.5 Assisting the Chief Information Officer (CIO) in policy and procedures for publicly releasing information on NASA Web sites per NPD 2810.1 and NPR 2810.1.

1.2.6 Assisting the Center Software Release Authority in making export classification determinations on NASA software prior to release per NPR 2210.1.

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1.2.7 Coordinating with the Center Export Counsel (CEC) on legal matters affecting the Center.

1.2.8 Coordinating with the Transportation Officer (TO) on international shipments, exports and imports.

1.2.9 Consulting with the HEA on export classification and licensing requests.

1.2.10 Compiling and providing ECP metrics to the HEA and Center management.

1.2.11 Serving as the point-of-contact for export control internal and external audits.

1.2.12 Coordinating with Center contractors involved in projects with international content.

1.2.13 Advising the Property Disposal Officer (PDO) on the export classification of property.

1.3 Assistant Center Export Administrator (ACEA)

The ACEA may be appointed by the CEA to support implementation of the MSFC ECP. ACEA duties include, but are not limited to:

1.3.1 Executing the duties of the CEA in his/her absence, as required.

1.3.2 Guiding and monitoring the activities of the Export Control Staff (ECS).

1.3.3 Overseeing the MSFC ECP Training Program for CERs and ECP Awareness Program for employees.

1.3.4 Serving as the Office of Primary Responsibility (OPR) for ECP Records Management.

1.3.5 Coordinating with auditors in the execution of the Export Control Auditing Program.

1.4 ECS

The ECS consists of civil servants and/or contractors that directly support the CEA. The ECS facilitates the execution and/or documentation of export compliance activities. ECS duties include, but are not limited to:

1.4.1 Planning and executing the MSFC Export Control Training Program for CERs.

1.4.2 Planning and executing the Export Control Awareness Program to increase the proficiency of new employees, new Supervisors, program/project managers, senior executives, and other stakeholders engaged in export control processes.

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1.4.3 Maintaining the ECP website at <https://explornet.nasa.gov/groups/export-compliance>. The ECP website provides key points of contact, a list of CERs, Agency and Center-specific training modules, links to U.S. laws and NASA policies, and relevant export control related forms.

1.4.4 Maintaining the ECP Records Management System in SharePoint.

1.4.5 Assisting the CEA with export authorizations, classification reviews and determinations, audits, property disposal, etc.

1.5 CEC

The CEC and Alternate CEC are appointed by the MSFC Chief Counsel to provide legal guidance to the CEA and Center management on export control matters. CEC duties include, but are not limited to:

1.5.1 Reviewing Center annual internal audit reports.

1.5.2 Reviewing Voluntary Disclosure reports of an export violation, as applicable.

1.5.3 Advising the CEA on statutory and regulatory interpretation of U.S. export control laws.

1.6 Center Program/Project Managers

Center Program/Project Manager responsibilities in export control matters are outlined in NPR 2190.1, Chapter 2. Program/Project Manager duties include, but are not limited to:

1.6.1 Consulting with the CEA early in a project's life cycle to ensure export control matters are considered in advance of prospective license applications, shipping or export dates, etc.

1.6.2 Developing a Technology Transfer Control Plan (TTCP) to apply safeguards for the export of commodities, software, technical data, technology, and/or defense services pursuant to international agreements or contracts.

1.6.3 Providing technical information to the CEA to permit an export determination, as needed.

1.6.4 Planning lead time for the submission, processing, and receipt of export licenses.

1.6.5 Overseeing MSFC-directed contractor export activities.

1.7 CERs

CERs are appointed annually by each Center organization to serve as the point of contact for exports of MSFC hardware, software, technology, technical data, and defense services. The CER's limited authority is "Pending" until completion of mandatory training. All CER training shall be completed no later than 30 April of each year. The CEA's delegation of authority to

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CERs may be rescinded if a CER fails or is unable to meet their responsibilities. CER duties include, but are not limited to:

1.7.1 Completing an Instructor-led “New CER Export Compliance” course to become certified as a new CER. CERs should build confidence in their knowledge and understanding of export processes before executing their authority and seek guidance when unsure of a process.

1.7.2 Returning CERs shall complete the annual “MSFC Export Control Refresher” course.

1.7.3 Pursuing learning opportunities in SATERN or external organizations beyond the basic certification training to enhance their understanding of export control. Search for “Export Control” in SATERN for a complete list of online training modules.

1.7.4 Interpreting and advising on export regulations, policies, and the Operations Manual.

1.7.5 Coordinating the organization’s input to the Center Sensitive Technologies Inventory.

1.7.6 Reviewing and approving a MSFC Form 4312, “Export Clearance Information Sheet (ECIS)” prepared by an Exporter. The MSFC Form 4312 documents the review and approval of an export authorization. The CER may initially determine if a license exemption or license exception is appropriate, however, the HEA shall approve all uses of exemptions/exceptions unless authority has been delegated to the CEA.

1.7.7 Conducting an export risk assessment and providing guidance on foreign national visits.

1.7.8 Providing guidance to international travelers on the strong recommendation to obtain a loaner laptop and other mobile assets that do not contain export controlled information.

1.7.9 Reviewing and signing the NASA Form 1676, NASA Scientific and Technical Information (STI) Document Availability Authorization (DAA), or electronic DAA (eDAA) for public release of NASA information.

1.7.10 Supporting the annual ECP internal audit, as requested.

1.7.11 Advising Site Owners on information authorized to be placed on a NASA Web page.

1.7.12 Conducting and documenting a check of the Denied Parties lists of the End-User and End-User’s company using the Visual Compliance application requested through the NASA Access Management System.

1.7.13 Assist Space Launch Systems (SLS) program personnel in the preparation of MSFC Form 4511, “SLS Data Concurrence Sheet,” to determine if there are any export-related distribution restrictions applicable to the documents being submitted to the SLS Data Management Team.

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1.8 Center TO

The processes for international shipments for exports and imports are managed by the Logistics Services Office (LSO). The Center TO ensures international shipments have been coordinated with the ECS and assigned a tracking number, are accompanied by authorizing documents, and are accurate and complete prior to executing the shipment.

1.9 Center PDO

1.9.1 The Center property disposal process is managed by the LSO. The PDO coordinates with the ECS to ensure property disposal activities are compliant with NPR 4300.1 and NPR 2190.1.

1.9.2 The PDO coordinates with the CEA/ECS to ensure the appropriate export control jurisdiction and classification determination is made prior to sale or federal electronic asset recycling.

1.9.3 The PDO coordinates with the PSECO to ensure recipients of NASA property are vetted and notifies the recipient of the export-controlled classification status of an item. PSECO vetting shall include verifying U.S. citizenship and checking the Denied Persons List and the Debarred Parties List.

1.10 Office of the CIO (OCIO)

The OCIO coordinates with the CEA to ensure Information Technology (IT) policies, standards, and procedures are compliant with NPD 2810.1; NPR 2810.1; and NPR 2190.1 to protect electronic export controlled data from unauthorized disclosure commensurate with its FIPS-199, categorization.

1.11 Center DAA Representative (DAAR)

The NASA Scientific and Technical Information (STI) process is managed by the Office of the Chief Information Officer. The Center DAAR is appointed by the Center Director and he/she coordinates with the CEA to ensure STI and DAA policies and procedures are compliant with NPD 2200.1 and NPR 2190.1. Center-specific procedural requirements for the release of STI are provided in MPR 2220.1. The MSFC DAAR duties include, but are not limited to:

1.11.1 Providing guidance on the NASA Form 1676 STI DAA or eDAA release process.

1.11.2 Receiving, reviewing, and maintaining the formal record of the NASA Form 1676.

1.11.3 Ensuring a CER signs the NASA Form 1676 before the release of NASA information.

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1.12 ECA

The ECA is an independent and qualified auditor appointed by the Center Director. ECA duties include, but are not limited to:

1.12.1 Conducting an annual audit of the MSFC ECP to ensure adequacy of the program. Audits are conducted in accordance with the NASA Export Control Audit Module provided annually by the HEA in January of each year.

1.12.2 Preparing an audit report to the Center Director and CEA that provides findings, identified best practices, and recommendations for improvement.

1.13 Exporter

The MSFC Exporter is an employee involved in the export of a specific shipment, hand delivery or electronic transfer of MSFC hardware, software, technology, technical data, and/or defense service to a foreign person or entity outside the United States, to a foreign national inside the U.S. (considered a “Deemed Export”). Exporter duties include, but are not limited to:

1.13.1 Completing the appropriate NAI 2190.1, checklist in a timely manner to request and obtain an export authorization (e.g. license, exemption, exception, or No License Required (NLR)) prior to executing an export. Incomplete requests will be returned to the Exporter for action.

1.13.2 Following the export control processes in NPR 2190.1, NAI 2190.1, and this MPR.

1.13.3 Consulting with the organization CER, and/or the ECS for export control guidance and assistance in preparing required export control authorizations. See Appendix E – MSFC Export Control Review Process Template for a flow diagram of the export process.

1.13.4 Ensuring the export has an MSFC Form 4312, Export Clearance Information Sheet, signed by the CER and other authorizing officials and has a tracking number assigned by the ECS.

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CHAPTER 2 EXPORT CONTROL PROCESS

2.1 General

2.1.1 Exporting is a privilege, not a right. The most significant steps in an export are to determine if the export is necessary and is in accordance with an approved international agreement, grant or contract. The Roles and Responsibilities and Technical Data and Goods clauses in the agreements or contracts provide guidance on the scope of exports and transfers that are consistent with the program, project or organization.

2.1.2 Export Control Reform (ECR) changed the jurisdiction and export classification of many NASA technologies and hardware. As result, it is essential that MSFC Exporters follow the most current export review processes and not rely on past export classification determinations.

2.1.3 NPR 2190, Chapter 3 provides policy and requirements for executing an export in accordance with U.S. export laws and NASA policy.

2.1.4 NAII 2190, Chapter 2 provides standard processes, checklists, and links to guide the Exporter in the execution of an approved export.

2.1.5 MSFC Exporters shall consult with the CEA in all cases when exporting NASA hardware, technology, software, technical data, or defense services.

2.1.6 MSFC contractors are responsible for export control compliance in the execution of contracted work and should seek guidance from their company Empowered Official.

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CHAPTER 3 CENTER EXPORT CONTROL TRAINING PROGRAM

3.1 General

3.1.1 The MSFC Export Control Training Program focuses on implementing the Agency's ECP in accordance with NPR 2190.1 and NAI 2190.1. NAI 2190.1 serves as the foundation for developing Center training and awareness programs. MSFC's ECP adheres to the specific training requirements and recommended best practices in NAI 2190.1, Chapter 4.

3.1.2 The CEA shall establish an ECP Training Program to certify CERs and an ECP Awareness Program to increase employee understanding and knowledge of Center export control processes.

3.1.3 The MSFC ECS will periodically consult with stakeholders to identify gaps in knowledge and determine specialized training needs.

CHAPTER 4 CENTER EXPORT CONTROL AUDITING PROGRAM

4.1 General

The purpose of the MSFC ECP Auditing Program is to ensure adequacy of the overall ECP and verify via sampling that required screening and licensing procedures are consistently followed, and that required documents are maintained in compliance with the U.S export laws.

4.2 Audit Guidance

Each January, the HEA sends an Audit Module to the CEA which provides instructions and identifies focus areas for conducting an internal audit. At the HEA's request, Center Directors appoint an ECA to conduct an audit of the MSFC ECP for the previous calendar year.

4.3 Final Audit Report

4.3.1 The CEA shall review the ECA's report and provide a written response to the findings and recommendations.

4.3.2 The CEA shall brief the Center Director, Associate Director, or designee on the results of the audit and the CEA's response.

4.3.3 The CEA will forward the final report with actions taken or pending to the HEA by the deadline established by the HEA in the Audit Module transmission letter.

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APPENDIX A. Key Export Control Definitions are found in Appendix A of NPR 2190.1 and in Appendix C of NAI 2190.1

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APPENDIX B. Acronyms

ACEA - Assistant Center Export Administrator

AES - Automated Export System

CCL - Commerce Control List

CEA - Center Export Administrator

CEC - Center Export Counsel

CER - Center Export Representative

CFR - Code of Federal Regulations

CIO - Chief Information Officer

CO - Contracting Officers

COR - Contracting Officer Representative

DAA - Document Availability Authorization

DAAR - Document Availability Authorization Representative

EAR - Export Administration Regulations

ECA - Export Control Auditor

ECCN - Export Control Classification Number

ECIILD - Export Control International and Interagency Liaison Division

ECIS - Export Clearance Information Sheet

ECP - Export Control Program

ECR - Export Control Reform

ECS - Export Control Staff

eDAA - Electronic DAA

FIPS - Federal Information Processing Standards

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HEA - Headquarters Export Administrator

ITAR - International Traffic in Arms Regulations

IT - Information Technology

IVC - International Visitor Coordinator

LSO - Logistics Services Office

NAII - NASA Advisory Implementing Instruction

NLR - No License Required

NRRS - NASA Records Retention Schedules

OCIO - Office of the Chief Information Officer

OIIR - Office of International and Interagency Relations

OPR - Office of Primary Responsibility

PDO - Property Disposal Officer

PSECO - Protective Services and Export Control Office

SLS - Space Launch System

STI - Scientific and Technical Information

TO - Transportation Officer

TTCP - Technology Transfer Control Plan

U.S. - United States

USML - United States Munitions List

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APPENDIX C. (Reserved for Verification Matrix)

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APPENDIX D. Records

Record	Record Custodian and Record Location	Retention	Requirement in this MPR
Export Control Licenses and/or Exemption, Exception	Maintained by MSFC CEA/ACEA in the PSECO	NASA Record Retention Schedules (NRRS) 2/7.5/A; For paper records retire to the Federal Records Center 5 years after the export approval date or the expiration of the License, whichever is longer. Maintain electronic records on site. Destroy/Delete records 10 years after the expiration date.	Para 1.4.4 and 1.13.1 in accordance with NPR 2190.1, Para 2.9.1c
Letters of Appointment for CEA, ACEA, CERs, and CEC.	Maintained by MSFC CEA/ACEA in the PSECO	NRRS 1/78/F/2; Cut off at end of Calendar Year. Destroy/Delete 5 years after cut off.	Para 1.7
MSFC TTCP	Maintained by MSFC CEA/ACEA in the PSECO	NRRS 2/7.5/A; Destroy/Delete 10 after the expiration date.	Para 1.6.2
MSFC Form 4312, ECIS	Maintained by MSFC CEA/ACEA in the PSECO	NRRS 2/7.5/A; Destroy/Delete 10 years after the export date	Para 1.7.6
NASA Form 1676	Maintained by MSFC DAAR in the CIO	Reference MPR 2220.1, Records	Para 1.11.2

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Record	Record Custodian and Record Location	Retention	Requirement in this MPR
MSFC ECP International Shipping Records; Automated Export System Filings (AES)	Maintained by MSFC TO in the AS40/LSO	Reference MPR 6000.1, Records	Para 1.4.4
MSFC ECP Voluntary Disclosures	Maintained by NASA HEA in the Office of International and Interagency Relations (OIIR)	NRRS 2/7.5/A	Para 1.4.4
A Log of MSFC ECP Violations	Maintained by MSFC CEA/ACEA in the PSECO	NRRS 2/7.5/A; Cut off at end of Calendar Year. Destroy/Delete 10 years after cut off.	Para 1.4.4
MSFC ECP Training Records; Annually, Monthly, Periodically, and On-line Training	Maintained by MSFC CEA/ACEA in the PSECO	NRRS 2/7.5/A; Cut off at end of Calendar Year. Destroy/Delete 10 years after cut off.	Para 1.3.3 and 1.4.2
Annual ECP Audit Report and Corrective Action Report	Maintained by MSFC CEA/ACEA in the PSECO	NRRS 2/7.5/A; Cut off at end of Calendar Year. Destroy/Delete 10 years after cut off.	Para 1.2.11 and 1.3.5

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APPENDIX E. MSFC Export Control Review Process Template

