



Export Compliance Essentials

Part 2
Building a Program That Works

Tuesday · February 10, 2026



International Trade & Compliance

- ◆ Import & Export Optimization Strategies
- ◆ In- & Out-sourced Trade Operations
- ◆ Documentation Requirements
- ◆ Tariff Classification
- ◆ Free Trade Agreements
- ◆ International Business Strategy
- ◆ Supply Chain Security & CTPAT
- ◆ Audits & Disclosures
- ◆ Antidumping & Countervailing Duties
- ◆ Broker & Forwarder Management
- ◆ Specialized Training
- ◆ Process Streamlining
- ◆ Navigating Controlled Exports

**Presenter:**

Michael D. Easton
President & General Manager
Licensed Customs Broker

Star USA, Inc.

Operating since 1996 with more than more than 240 years of combined experience.

Learn more at starusa.org



Previously on Star USA...

Identifying 4 of the main agencies controlling exports:

1. Foreign Trade Regulations (FTR)
2. Export Administration Regulations (EAR)
3. International Traffic in Arms Regulations (ITAR)
4. Office of Foreign Assets Controls (OFAC)

Keywords, terms, information sources, penalties, and more.

2 Rules for Export Compliance



Exporting is a **privilege**, not a right

Privileges come with responsibilities – and *penalties*.

Privileges can be revoked.



Exporters must **demonstrate** compliance

Know your role.
Presumption of non-compliance.

Keep and maintain records.

Developing Your Export Strategy



Know your Business.

Building a program that works requires knowledge of your business **and** how the rules affect you – directly and indirectly.

Considerations:

- Program Flow
- Situational Awareness
- Planning

Program Flow



Priority Recognition

Identify weak points, knowledge gaps, strategic vulnerabilities, as well as awareness & information needs.

Resource Allocation

Identify and allocate the appropriate resources to meet core objectives.

Monitor & Review

Verify using reports, narrative assessments, and KPIs to evaluate progress.



Activity Assessment

Apply the regulatory environments of primary control to your business practices.

Action Planning

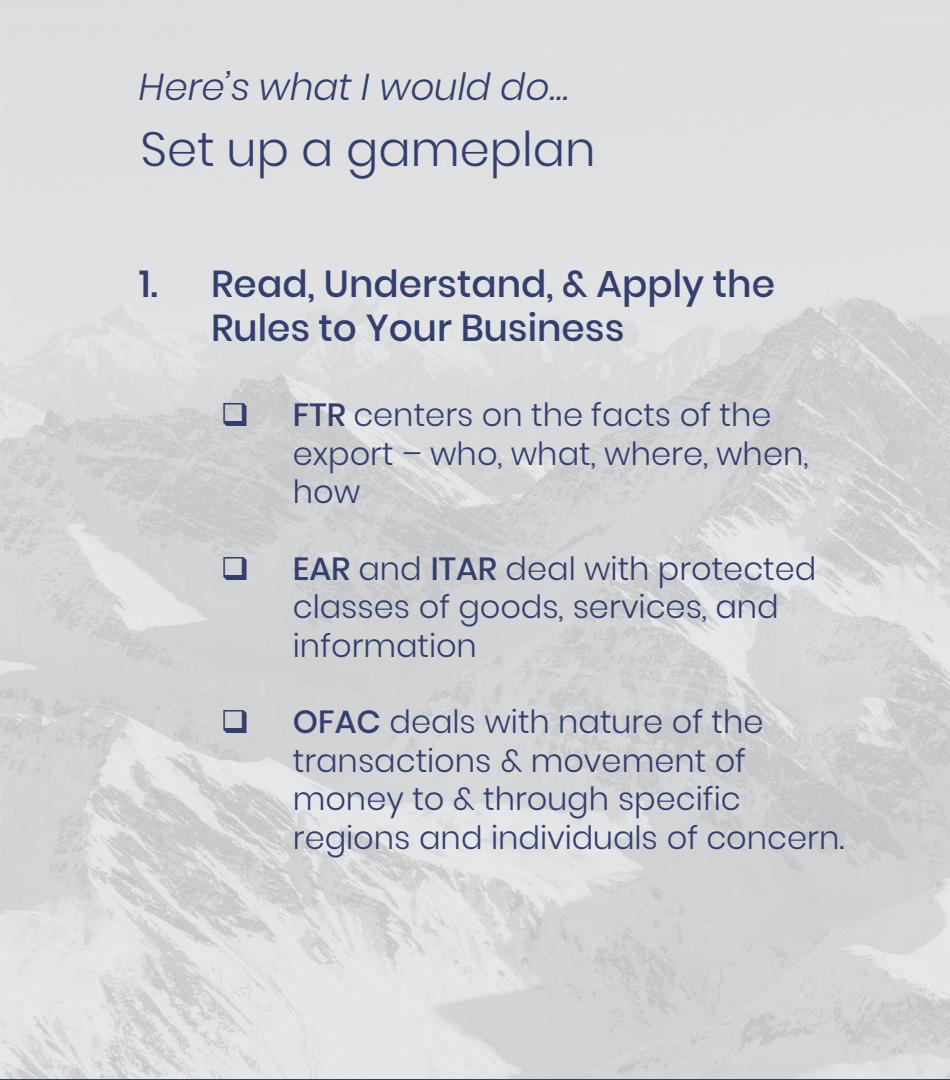
Based on risk, prioritize resolutions and develop an action plan to correct any deficiencies and raise awareness.

Communications & Information Sharing

Disseminate key information to stakeholders and impacted parties.

Re-assess

Re-evaluate risk areas and concerns; set new priorities and repeat the process.



Here's what I would do...

Set up a gameplan

1. Read, Understand, & Apply the Rules to Your Business

- ❑ **FTR** centers on the facts of the export – who, what, where, when, how
- ❑ **EAR** and **ITAR** deal with protected classes of goods, services, and information
- ❑ **OFAC** deals with nature of the transactions & movement of money to & through specific regions and individuals of concern.



2. Create a profile of the business

- ❑ Product base
- ❑ Nature of business transactions
- ❑ Regions of trade
- ❑ Partner network
- ❑ Export histories
- ❑ Documentation & recordkeeping

3. Evaluate, quantify & articulate critical activities

- ❑ FTR Routed & Non-Routed
- ❑ CSL & RPS Screening
- ❑ CCL & ECCN Determination
- ❑ USML & ITAR Categories
- ❑ Sanctions & Embargoes
- ❑ License Requirements
- ❑ VSD & Penalty Environment

4. Cultivate resource & partner network

- ❑ Internal Teams
- ❑ Brokers & Forwarders
- ❑ Consultants & Service Providers
- ❑ Gov't Programs

Here's what I would do...
Create a Plan

Establish Priority:

- ACTUAL violations
- SUSPECTED violations

- LICENSABLE activity

- PROCESS improvement opportunities, esp. communications



Handling Violations

- ◆ Immediately cease violating activities
- ◆ Obtain comprehensive documentation
- ◆ Determine regulatory scope & framework, including penalty exposure
- ◆ Internal awareness & alignment, external support as appropriate
- ◆ Voluntary Self-Disclosure
- ◆ Remedial action
- ◆ Monitor & re-evaluate

Here's what I would do...
Create a Plan

Establish Priority:

- ACTUAL violations
- SUSPECTED violations

- LICENSABLE activity**

- PROCESS improvement opportunities, esp. communications



Licensable Activity

- ◆ Determine regulatory scope & framework, including penalty risk
- ◆ Internal awareness & alignment, external support as appropriate
- ◆ Establish clear and definitive processes
- ◆ Establish Empowered Official?
- ◆ Communicate with all involved parties
- ◆ Document everything
- ◆ Monitor & evaluate

Here's what I would do...
Create a Plan

Establish Priority:

- ACTUAL violations
- SUSPECTED violations

- LICENSABLE activity

- PROCESS improvement opportunities, esp. communications**



Process Improvement

- ◆ Clarify and align regulatory responsibilities with business activities and objectives
- ◆ Quantify the scope of activity, delineate roles and responsibilities
- ◆ Allocate appropriate resources by role and area of oversight
- ◆ Empower through appropriate education, training & communication
- ◆ Routinely audit & evaluate
- ◆ Create succession plans



Here's what I would do...

Prepare for Changes

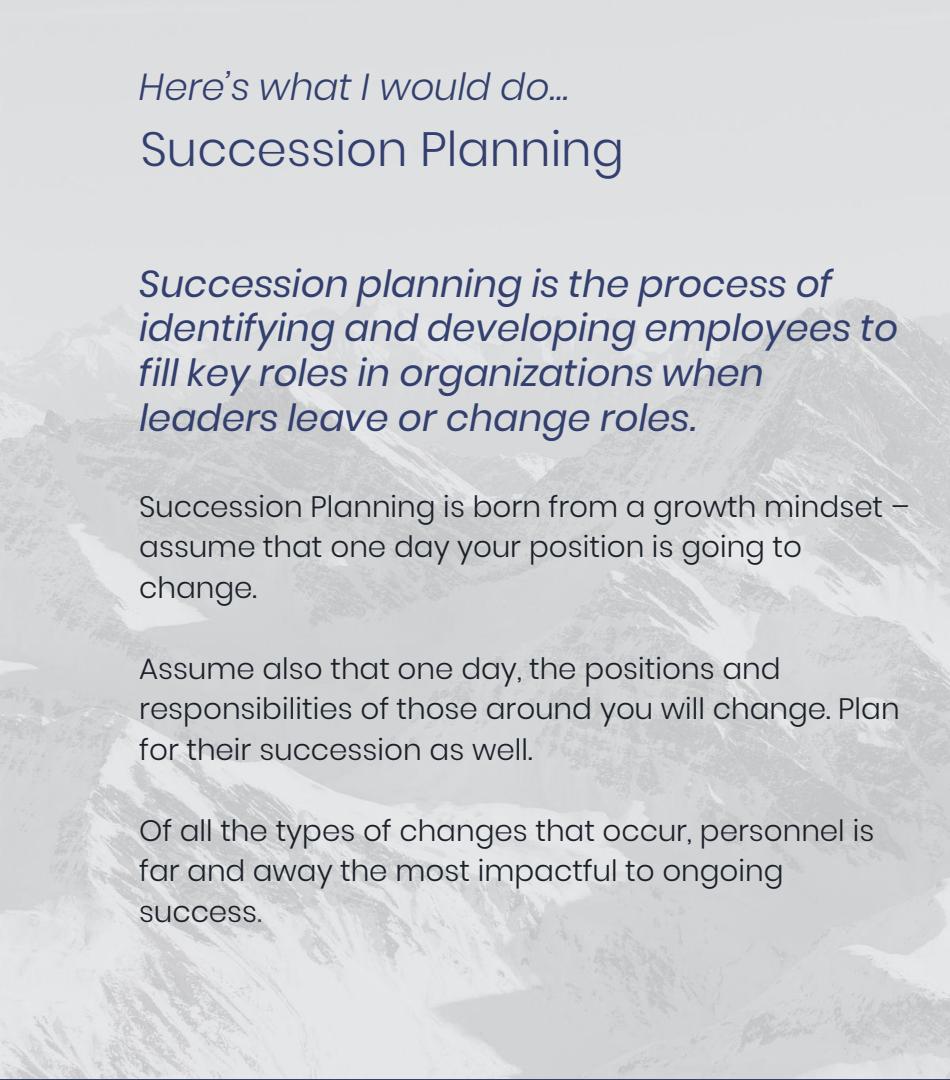
Change is inevitable.

- ❑ New Facts – Regulatory changes & key policy updates, new rules and guidance
- ❑ New Humans – internally, brokers/forwarders, customer base, M&A, etc.
- ❑ New Products – purchased vs. produced, formula & BoM changes, market application
- ❑ New Tools – systems, technology, methods & practices



Handling Change

- ◆ **Self-awareness**
Acknowledge limitations & blind spots
- ◆ **Situational awareness**
Make it a point to observe and review prior assumptions & understanding
- ◆ **Shared awareness**
Pro-actively seek information; share relevant information
- ◆ **Impact assessment**
Objectively interpret the net result of changes: regulatory risk, process deviation, nuisance...?



Here's what I would do...

Succession Planning

Succession planning is the process of identifying and developing employees to fill key roles in organizations when leaders leave or change roles.

Succession Planning is born from a growth mindset – assume that one day your position is going to change.

Assume also that one day, the positions and responsibilities of those around you will change. Plan for their succession as well.

Of all the types of changes that occur, personnel is far and away the most impactful to ongoing success.



Preparing for successors

- ◆ **Clarify objectives**

Be specific and tie together regulatory risk, business incentives, and, frankly, the sanity-improving projects & goals. There's never enough sanity to go around.

- ◆ **Document successful efforts**

Between policies, procedures, and work instructions, I find work instructions to be the most impactful. If there's a way that works, take the time to write it down.

- ◆ **State incomplete projects**

There's always a next step; keep tabs on ideas and initiatives that are on the list, that are in-process.



Protect Your Business in a Global Marketplace

Ohio APEX Accelerator + Ohio Export Assistance Network

Part II: Fundamentals of Cybersecurity and Export Control ITAR

Thursday, Feb 12 – 9:30am EST (Virtual)

[Register & More Info Here](#)

csusbdc.com/workshops/protect-your-business

Part 1 – Getting Started in Gov't Contracting & Foreign Trade available [on YouTube](#)

Part II: Protect Your Business in a Global Marketplace
Fundamentals of Cybersecurity and Export Control ITAR



Event Details

Date: February 12, 2026

Time: 9:30Am - 10:30Am

Venue: Zoom

Cost: No Fee

[Register: Part II](#)

Navigating the 2026 Global Trade & Logistics Landscape:

Charting a Course through
Uncertainty

Keynote Speaker:
Pete Mento
*Director, Global Trade
Advisory Services,
Baker Tilly | U.S. LCB*



Friday, March 27, 2026 | 8:30–4:30
Olmsted Township Community Room

Join industry leaders and policy experts for an educational summit focused on the future of supply chains, regulation, and trade.

CE credits will be available.

Key Topics:

- Tariff Turbulence: What 2026 Brings
- Free Trade Agreements that Drive Growth
- Smarter Supply Chain with AI Automation

Registration opens soon. Mark your calendar!



For Women in International Trade

Columbus, OH
Fall 2026





Related Star USA Webinars



EEI Filings: When, How & Who's Responsible



What the CCL!



EAR, ECCN & Licensing



Star USA
Thank you!



Upcoming Webinar Export Compliance Essentials: Resources & Partner Programs

CE Code for Today's Webinar

1 LCB/CES/MES credit available from watching
the recording until 1/15/2027