

PROPERTY MANAGEMENT/EXPORT CONTROL

Qualification Card for High Risk Property Administrator (HRPA)

Name:	HRP site lead:	Date initiated:
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This Qualification Card is designed to serve as a foundational template for laboratories, sites, and facilities dedicated to fostering the development and recognition of expertise among personnel in the field of High Risk Property (HRP) administration. It is structured to document the progression of an individual's qualifications, their understanding and application of pertinent federal regulations and manuals, and the demonstration of their skills across three distinct levels: Apprentice, Journeyman, and Expert. Additionally, this card encompasses a section for supplemental training aimed at facilitating the acquisition of specialized experience, further enhancing the professional's capability in managing HRP.

It is imperative to recognize that while this document provides a robust framework for standardizing the development of HRP professionals, it is intended to be adaptable. Laboratories, plants, and sites are encouraged to modify this template as necessary to align with their unique operational requirements, regulatory obligations, and proliferation risks. This flexibility ensures that the Qualification Card remains a relevant and effective tool for professional growth, compliance, and excellence in HRP administration.

Implementation of this Qualification Card should help establish a clear pathway for professional development, ensure a consistent understanding and adherence to federal guidelines, and recognize the attainment of specialized skills and knowledge. This document serves to reflect your personal and organizational commitment to maintaining the highest standards of accountability and efficiency in HRP management.

Trainees and HRP Site Leads/Property Managers are encouraged to engage in this process with a spirit of collaboration, dedication to excellence, and a continuous pursuit of professional development. The goal is to cultivate a culture of competence, integrity, and responsibility, ensuring the highest standards of performance in the administration of HRP.

QUALIFICATIONS	
This section is designated for Trainees to document the completion dates of relevant training courses taken as part of their professional development in HRP administration. Accurate recording of these dates is crucial for tracking progress, ensuring compliance with training requirements, and facilitating the continuous advancement of skills and knowledge. Trainees are encouraged to update this section promptly upon the completion of each training course, maintaining a detailed record of their professional development.	
Training	Certificate Date
High Risk Property Awareness Training (2-hour virtual) —Designed for the U.S. Department of Energy's National Nuclear Security Administration (DOE/NNSA) and contractor personnel who are responsible for the life cycle management of proliferation-sensitive property. Provides awareness of DOE/NNSA High Risk Property (HRP) management requirements necessary to mitigate proliferation risks. Go to https://hrp.doe.gov/Registration/Event .	
Nonproliferation for High Risk Property Workshop (3-day course, recommended every 3 years) —Designed for DOE and DOE contractor personnel who are responsible for the life cycle management of proliferation-sensitive property. It explores the fundamentals of U.S. nonproliferation policy and applicable requirements for handling proliferation-sensitive equipment, materials, and technology. Go to https://hrp.doe.gov/Registration/Event .	
Restricted Party Screening (RPS) (1-hour virtual) —Designed for U.S. Government federal employees, their staff, and contractors at DOE/NNSA headquarters, field and site offices, national laboratories, and supporting elements. Examines basics of RPS, its importance, and conducting screenings using specialized tools to ensure "bad actors" are denied access to DOE goods, technologies, and services. Go to https://hrp.doe.gov/Registration/Event .	

<p>Department of Commerce: Complying with U.S. Export Controls (1–2 day)—Core courses on the Export Administration Regulations (EAR) as well as in-depth courses on special topics of interest to the exporting community. Instructors are experienced export administration and regulatory policy specialists, engineers and enforcement personnel from the Bureau of Industry and Security’s Washington, DC, headquarters and field offices, as well as representatives from other U.S. Government agencies as appropriate. Go to https://www.bis.doc.gov/index.php/compliance-a-training/export-administration-regulations-training.</p>	
<p>Defense Logistics Agency Demilitarization Training (3-day course recommended every 5 years, refresher course required annually)—The Defense Demilitarization Program Course (DDPC) is mandatory for U.S. Department of Defense (DOD) component personnel involved with the DoD DEMIL Program. After successful completion of the DDPC, students will become eligible for the web-based Defense DEMIL Program Refresher Course for a period of 1 year from DDPC completion date. Go to https://hrp.doe.gov/Registration/Event.</p>	

READING AND FULL COMPREHENSION	
<p>The intent of this section is to evaluate and document the depth of understanding that a Trainee possesses regarding the federal regulations, manuals, and guidelines pertinent to HRP administration. This evaluation is crucial for ensuring that all personnel involved in the management of HRP are equipped with the knowledge necessary to perform their duties, efficiently and in compliance with all relevant regulations and best management standards.</p> <p>To accurately assess and determine the level of comprehension—categorized into Apprentice, Journeyman, or Expert—each Trainee should engage in a detailed discussion with the HRP Site Lead/Property Manager. This meeting is an essential component of the qualification process, providing an opportunity for the Trainee to demonstrate their understanding, ask questions, and receive feedback on areas requiring further development.</p> <p>The determination of comprehension level serves multiple purposes:</p> <ul style="list-style-type: none"> • Apprentice: Indicates foundational understanding, requiring further study and experience. • Journeyman: Signifies a solid grasp of the subject matter, with some areas possibly needing refinement. • Expert: Demonstrates a comprehensive and nuanced understanding, capable of guiding others and making informed decisions. <p>This structured approach ensures that comprehension levels are assessed in a manner that is both fair and reflective of the Trainee's actual knowledge and understanding. It also facilitates targeted professional development, allowing Trainees to focus on specific areas for improvement.</p>	<p>Annotate Level and Date Evaluation Completed (Example: Journeyman - Dec 2024)</p>
<p>NNSA Policy Letter, NAP-476.1, Atomic Energy Act Control of Import and Export Activities, R024 Procedure, and T-146 Tier Listing</p> <p>Outlines the procedures for controlling import and export activities related to atomic energy under the Atomic Energy Act, detailing the regulatory framework for compliance and the tier listing system (T-146) that categorizes items based on their sensitivity and potential impact on national security.</p>	
<p>41 CFR 109 DOE Property Management Regulations</p> <p>Provides guidelines for the management, accountability, and disposal of property owned or controlled by the Department of Energy (DOE) to ensure compliance with federal laws and efficient use of resources. Emphasis for study of section 1.53.</p>	
<p>41 CFR 101, Federal Property Management Regulations</p> <p>Establishes regulations that provide guidelines and procedures for the management, utilization, and disposal of federal property to ensure accountability, efficiency, and compliance with applicable laws and policies.</p>	
<p>41 CFR 102, Federal Management Regulations, Personal Property</p> <p>Outlines the regulations governing the management, acquisition, utilization, and disposal of personal property by federal agencies, ensuring effective stewardship and compliance with relevant laws and policies.</p>	

READING AND FULL COMPREHENSION

Export Administration Regulations, with specific emphasis on the following:

15 Part 738, Commerce Control List Overview and the Country Chart

Provides an overview of the Commerce Control List (CCL), detailing the categories of items subject to export controls and the corresponding Country Chart that specifies the licensing requirements based on the destination country and the nature of the goods or technology being exported.

15 Part 774, The Commerce Control List

Outlines the CCL, which categorizes items subject to U.S. export controls based on their technical characteristics and intended use, specifying the licensing requirements for exporting these items to various countries.

International Traffic in Arms Regulations (ITAR) 22 CFR 121

The U.S. Munitions List (USML) enumerates defense articles and services subject to strict export controls to ensure national security and foreign policy interests.

10 CFR 110, Export and Import of Nuclear Equipment and Material: Appendices A-O

Establishes the regulations governing the export and import of nuclear equipment and material, ensuring compliance with U.S. laws and international agreements related to nuclear nonproliferation and safety.

DOD 4160.28, Defense Demilitarization Manual, Volumes 1 and 2

Provides comprehensive guidelines and procedures for the demilitarization of defense articles and services, ensuring that surplus military equipment is rendered unusable for military purposes in compliance with U.S. laws and regulations.

Foreign Assets Control Regulations 31 CFR 500-598

Establishes the legal framework for the U.S. Government's enforcement of economic sanctions and trade restrictions against foreign countries, entities, and individuals to protect national security and foreign policy interests.

DEMONSTRATED SKILLS

This section of the Qualification Card is intended to capture and validate the practical application of knowledge in the field of HRP administration. This section is pivotal in illustrating the Trainee's ability to translate theoretical understanding into effective action and decision-making in real-world scenarios. It is through the demonstration of skills that a Trainee's proficiency and readiness to handle the complexities of HRP administration are truly assessed.

To ensure a comprehensive evaluation of the Trainee's capabilities, it is imperative for the Trainee to collaborate closely with the HRP Site Lead/Property Manager. This collaboration involves the demonstration of specific skills relevant to HRP administration, followed by an assessment to classify the Trainee's skill level into one of three categories: Apprentice, Journeyman, or Expert. This classification is based on the following criteria:

- Apprentice: Demonstrates basic operational skills, with guidance needed to perform complex tasks.
- Journeyman: Shows competent execution of tasks with minimal supervision and possesses the ability to solve problems independently.
- Expert: Exhibits mastery over a wide range of skills, provides leadership, and innovates solutions to new challenges.

The process of demonstrating and evaluating skills is designed to be dynamic and interactive, providing an invaluable learning experience for the Trainee and an opportunity for the HRP Site Lead/Property Manager to mentor and guide the development of future HRP subject matter experts.

This section not only acknowledges the skills that have been mastered but also identifies areas where further development is needed, thereby directing the Trainee's future learning and growth. It is a testament to your commitment to fostering a highly skilled, adaptable, and proficient workforce capable of managing the unique challenges associated with HRP throughout the property lifecycle.

<i>HRP site lead will annotate as trainee graduates in skill level by date.</i>	Apprentice	Journeyman	Expert
Demonstrate proficiency in conducting HRP reviews on Department of Commerce (DOC) items.			
Demonstrate proficiency in conducting HRP reviews on Department of State USML items.			
Demonstrate proficiency in conducting HRP reviews on 10 CFR 110 (trigger list and especially designed or prepared) items.			
Demonstrate proficiency in conducting HRP reviews on NAP 476.1 weapons items.			

DEMONSTRATED SKILLS			
Demonstrate an understanding of U.S. RPS (for sanctions and embargoes) and end-user screening in accordance with (IAW) OFAC, Department of State, Department of Commerce, and other requirements.			
Demonstrate proficiency in the use of end-use/end-user certificates.			
Demonstrate an understanding of the various avenues and methods associated with property disposition (excess property sales, electronics recycler, classified landfill, etc.) as specified in 41 CFR 102, 41 CFR 101, and 41 CFR 109.			
Demonstrate proficiency in demilitarization code determinations, DEMIL destruction plans, and DEMIL witness/validation in accordance with DOD 4160.28, volumes 1 and 2.			
Demonstrate proficiency in destruction (rendering useless or destroying) plan development, and witness verification as specified in IAW NAP 476.1 and/or 41 CFR 109–1.53.			
Demonstrate an understanding of exception from destruction requests as specified in IAW 41 CFR 109–1.53.			

I have completed the training, required reading, and on-the-job training referenced above. I am prepared to assume the duties of an HRP.

Trainee Signature

Date

The named individual is qualified to perform the duties of an HRP.

HRP Site Lead or Property Manager Signature

Date

The following informational training courses/workshops are supplemental to high risk qualification but highly recommended:

SUPPLEMENTAL TRAINING	
This section is dedicated to documenting any Supplemental Training that Trainees undertake beyond the foundational courses. These additional training opportunities are designed to deepen expertise, refine skills, and ensure Trainees are equipped to navigate the complexities of HRP administration at an expert level. Trainees are encouraged to proactively seek out and engage in such training, as it represents a commitment to achieving the highest standards of professional excellence. Upon completion of each supplemental training course, Trainees should promptly record the details.	
Course Descriptions	Certificate Date
Export Control Awareness (2-hour virtual) —Provides U.S. Government federal employees, their staff, and contractors with an overview of export control responsibilities, emphasizing compliance and the impact of regulations on their programs. Participants will learn about controlled technology and key contacts for assistance in navigating export control requirements. Go to https://ecap.learning.ornl.gov or email ecap@ornl.gov .	
Export Controlled Information (ECI) Workshop (2-day in-person) —This course provides U.S. Government federal employees, their staff, and contractors with a foundational understanding of U.S. nonproliferation policy and export control regulations, focusing on the review, handling, and marking of proliferation-sensitive and export-controlled information. Participants will engage in detailed regulatory reviews, hands-on exercises, and interactive modules to enhance their knowledge and skills in managing controlled technology. Go to https://ecap.learning.ornl.gov or email ecap@ornl.gov .	
Department of State: SIA Basics Conference (or similar) —Designed for newcomers to export licensing. Participants receive a comprehensive, step-by-step guide on exporting articles on the USML and CCL,	

including insights into the license application process and requirements from the Department of State and the Department of Commerce.	
<p><i>Various DOE/NNSA sponsored nonproliferation courses (as applicable). Go to https://one.ornl.gov. If you have difficulty opening the Workshop Series Flyer link, please contact Cathy Bynum at cbynum@anl.gov for an emailed flyer.</i></p> <p>Such training includes, but is not limited to:</p> <ul style="list-style-type: none"> • <i>Advanced Missile Technologies (4-day in-person) – Salt Lake City, UT, Requirements: TS/SCI and either CNWDI or Q-clearance. U.S. citizens only.</i> • <i>Emerging Technologies: Hypersonics (2-day in-person) – Lawrence Livermore National Laboratory, Livermore, CA, Requirements: No clearance required. U.S. citizens only.</i> • <i>Chemical and Biological Weapons (3-day in-person) – Argonne National Laboratory, Lemont, IL Requirements: TS/SCI clearance required for the last day of the course (June 27). U.S. citizens only.</i> 	

For questions, please visit the HRP website at [Contacts - High Risk Property](https://hrp.doe.gov/Home/Contacts) (<https://hrp.doe.gov/Home/Contacts>).

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