ITAR Supplier Qualification Checklist

A 32-point checklist for OEM procurement teams selecting an ITAR-registered CNC machining supplier · Published by Olympus Machining LLC · CAGE 9V9P0

1. Registration & Legal Standing

- [ ] **1.** Supplier is registered with the U.S. Directorate of Defense Trade Controls (DDTC) under 22 CFR Part 122. Ask for the DDTC registration code and expiration date.
- [ ] **2.** Supplier has a valid CAGE Code in the SAM.gov registry. Verify the code is **active**, not expired or 'expired-not-renewed'.
- [ ] **3.** Supplier's business address in DDTC records matches the physical shop address where controlled work is performed. Watch for suppliers who list a corporate HQ but manufacture elsewhere.
- [ ] **4.** Registration category is appropriate — Manufacturer, Exporter, or Broker — for the work being placed. Most CNC job shops should be registered as Manufacturers.
- [ ] **5.** Supplier has no active DDTC enforcement actions, consent agreements, or debarments. Check the DDTC Consent Agreements and Debarments list.

2. Access Controls & Personnel

- [ ] **6.** Supplier has a written U.S. Person verification procedure aligned with 22 CFR 120.62. All employees with access to ITAR-controlled technical data have documented proof of U.S. Person status.
- [ ] **7.** Access to controlled technical data is restricted by role. Not every employee has access to every drawing.
- [ ] **8.** Foreign-national employees, contractors, and visitors are excluded from areas where ITAR-controlled work is performed, or supplier holds a valid TAA/MLA covering their access.
- [ ] **9.** Building has physical access controls — locked doors, badge access, or visitor sign-in — separating ITAR work areas from public/office spaces.
- [ ] **10.** IT systems that store or transmit ITAR technical data have documented U.S.-only administrator access.

3. Technical Data Handling

- [ ] **11.** Digital drawings, models (STEP, IGES, native CAD), and inspection reports are stored on U.S.-hosted servers or U.S. cloud regions. No offshore backup, no unrestricted cloud sync.
- [ ] **12.** Email containing ITAR technical data is encrypted at rest and in transit. TLS 1.2+ minimum. FIPS 140-2 validated encryption preferred.
- [ ] **13.** File transfer methods are documented and restricted — no consumer file-sharing services (WeTransfer, Dropbox personal, Google Drive personal) for ITAR data.
- [ ] **14.** Printed drawings are controlled — logged out, returned or shredded, not left on machine tools overnight.
- [ ] **15.** Supplier can produce a Data Handling Plan on request describing how customer's specific technical data flows through their systems.

4. Manufacturing & Supply Chain

- [ ] **16.** All machining is performed at the U.S. address on the DDTC registration. No offshore subcontracting of controlled work — including no 'we send it to a partner shop for the deburring.'
- [ ] **17.** Suppliers used for outside processes (heat treat, plating, anodizing, NDT) are ITAR-registered themselves or the supplier holds a valid TAA/MLA for the transfer.
- [ ] **18.** Material traceability by heat/lot is maintained for every controlled part. Certificates of conformance and mill certifications are retained per contract requirements.
- [ ] **19.** Rejected parts, scrap, and non-conforming material are handled per a documented procedure — including physical destruction or controlled disposal of scrap containing technical data (e.g., unique geometry).
- [ ] **20.** Supplier maintains a documented counterfeit parts prevention procedure aligned with AS5553 or AS9100D 8.1.4.

5. Documentation & Recordkeeping

- [ ] **21.** Supplier retains ITAR technical data and shipping records for a minimum of 5 years per 22 CFR 122.5(a).
- [ ] **22.** Export licenses (DSP-5, DSP-73, TAA, MLA) are retained where applicable, with clear links to the transactions they authorize.
- [ ] **23.** AS9102 First Article Inspection records — Form 1, Form 2, Form 3 — are generated for controlled parts and retained per contract terms.
- [ ] **24.** Every shipment of controlled hardware includes an ITAR statement on the shipping documentation, packing list, or invoice.
- [ ] **25.** Supplier can produce their DDTC-registered Empowered Official's name and contact information on request.

6. Cybersecurity Alignment

- [ ] **26.** Supplier has attested to CMMC Level 1 (15 FAR 52.204-21 safeguards) at minimum. If handling CUI (Controlled Unclassified Information) beyond FCI, they should be on the CMMC Level 2 path.
- [ ] **27.** Multi-factor authentication is enforced on all user accounts with access to ITAR technical data.
- [ ] **28.** Anti-malware protection is active on all endpoints where ITAR technical data is handled.
- [ ] **29.** Supplier has a documented Incident Response procedure covering suspected export violations or data breaches involving ITAR technical data.
- [ ] **30.** Removable media (USB drives, external hard drives) use is either blocked or restricted to encrypted, tracked devices.

7. Contract & Flow-Down

- [ ] **31.** Supplier's standard PO acknowledgment or terms include acceptance of ITAR flow-down language (DFARS 252.225-7048, ITAR marking requirements, technical data control clauses).
- [ ] **32.** Supplier flows down ITAR requirements to their own sub-tier suppliers (heat treaters, coaters, hardware providers) with equivalent access-control obligations.

32 checkpoints total. A qualified ITAR supplier passes all 32. A supplier that passes fewer than 28 is a real audit risk on defense programs — request corrective action before placement.

About Olympus Machining LLC

ITAR-registered with DDTC. CMMC Level 1 aligned per FAR 52.204-21. CAGE Code 9V9P0. Precision CNC machining in Hanover, Pennsylvania. AS9102 First Article Inspection produced in-house on Haas HMM 430 CMM. Ti-6Al-4V, Inconel 718, 316L, 4140 alloy steel, PEEK, 6061/7075 aluminum.

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