United States Department of State

Washington, D.C. 20520

May 1, 2020

Paul Ray, Administrator
Office of Information and Regulatory Affairs
Office of Management and Budget

Administrator Ray:

The Department of State requests OMB emergency processing of a change request to the DS-6004, Request to Change End-User, End-Use and/or Destination of Hardware.

The Directorate of Defense Trade Controls (DDTC) requests emergency approval for a change request to 1405-0173 due to the ongoing SARS-COV2 pandemic requiring DDTC staff to work remotely. Requests under this information collection may sometimes be sent to DDTC via hard copy (mailed in submissions). On March 13, 2020 the Under Secretary of State for Management notified all Department employees that Department leadership had been directed "to maximize telework flexibilities, consistent with OMB guidance to both benefit and protect" employees. Consistent with this and subsequent Department guidance, DDTC has implemented maximum telework flexibilities and the number of employees present in DDTC offices. DDTC understands that U.S. exporters are implementing similar policies across the country. These practices are consistent with public health guidance from the U.S. Government to practice social distancing and maximize telework arrangements whenever possible to slow the spread of the novel coronavirus. These practices are also consistent with stay-home orders issued by several states – including New York, California, Maryland, the District of Columbia, and Virginia - which mandate the closure of non-essential businesses. With limited staff in the office due to the SARS-COV2 pandemic, it is very difficult for DDTC to receive, review and process mailed in submissions. In order to ensure continuity of operations within DDTC and among ITARregistered entities and to continue its mission of ensuring that commercial exports of defense articles and defense services advance U.S. national security and foreign policy objectives, there must be a mechanism in place to receive all authorization requests during the SARS-COV2 pandemic. DDTC's proposed solution is to modify the DS-6004 in the Defense Export Control and Compliance System (DECCS) to allow for the upload of electronic General Correspondence submissions.

Sincerely,

Neal Kringel,

Director of Management,

Directorate of Defense Trade Controls,

Department of State