

U.S. State Department Announces Temporary ITAR Provisions In Response to COVID-19

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The Department of State's Office of Defense Trade Controls Policy [announced](#) that they are temporarily suspending, modifying, and excepting certain International Traffic in Arms Regulations (ITAR) requirements in an effort to mitigate the impact of the COVID-19 pandemic. The temporary changes are as follows:

- As of February 29, 2020, ITAR registrations and fees with an expiration dates from February 2020 through June 30, 2020 are extended for two months from the original expiration date.
- As of March 13, 2020, ITAR licenses and agreements expiring between March 13 and May 31, 2020 will be extended for six months from the original expiration date, so long as there are no changes to the name/address, scope, or value of the authorization.
- As of March 13, 2020, there is a temporary suspension, modification, and exception to the requirement that a regular employee, for purposes of ITAR § 120.39(a)(2), work at the company's facilities, to allow the individual to work at a remote work location. Additionally, regular employees of licensed entities, who are working remotely in a country not currently authorized by a technical assistance agreement (TAA), manufacturing license agreement or exemption, can access, send, or receive technical data that is authorized for export, reexport or retransfer to their employer via a TAA.

For both situations, the individual employee must not be located in Russia or a country listed in ITAR § 126.1. These two provisions end on July 31, 2020, unless extended in writing.

We are happy to answer questions about these or other recent trade compliance changes in light of the COVID-19 pandemic.