

ITAR Part 120 (22 CFR §120)

ITAR Part 120 defines key terms to clarify compliance obligations for handling export-controlled defense articles, services, and technical data.



What it is

U.S. ITAR Part 120 (Limited Scope) is a regulatory framework that helps organizations clarify definitions and terminology related to the International Traffic in Arms Regulations (ITAR), supporting understanding of compliance obligations when handling controlled defense articles, services, and related technical data.

Issued and enforced by the U.S. Department of State's Directorate of Defense Trade Controls (DDTC), ITAR Part 120 provides foundational definitions used by defense contractors, aerospace organizations, and manufacturers involved in the export, import, or transfer of defense-related items. This section specifies key terms that support broader ITAR compliance, fostering accurate classification and privacy of sensitive information under U.S. law.

At a glance

PUBLISHER	TYPE	VERSION
U.S. Department of State	Regulation	2022
EFFECTIVE	DOMAIN	FAMILY
September 6, 2022	Other	Other
REGION	INDUSTRY	ADOPTION MODEL
United States	Aerospace & Defense	Regulatory Compliance
IMPLEMENTATION COMPLEXITY		
Moderate		

Source: <https://www.ecfr.gov/current/title-22/chapter-I/subchapter-M/part-120>

Why it matters

- **Strengthen regulatory compliance** Provide a clear basis for understanding and applying export control requirements, reducing risk of non-compliance and associated penalties.
- **Enhance data protection practices** Enable accurate classification and safeguarding of controlled technical information, minimizing exposure of sensitive defense-related data.
- **Support risk-based decision making** Facilitate informed risk assessments by standardizing key terms for consistent application across compliance and security processes.
- **Promote audit readiness** Ensure comprehensive documentation and reporting by integrating precise regulatory language into compliance reviews and export control audits.

How SmartSuite supports ITAR Part 120

Export-Controlled Data Classification Library Structure definitions for defense articles, technical data, and controlled information governed by ITAR Part 120.	Export-Controlled Data Location Tracking Track systems, repositories, and processes where export-controlled technical data is stored or transmitted.	Personnel Authorization and Access Governance Manage approvals and restrictions for individuals authorized to access ITAR-controlled information.
ITAR Vendor and Transfer Tracking Track vendors, partners, and international data transfers subject to ITAR restrictions.	Export Violation Monitoring and Corrective Actions Monitor potential export violations and track corrective actions and compliance reviews.	Export Compliance and Access Governance Reporting Provide centralized reporting showing controlled data scope, access governance, and export compliance posture.

Common framework mappings

CJIS Security Policy

CMMC 2.0

ISO 27001:2022

ISO 27701

NIST 800-171 Rev. 3

NIST 800-53 Rev.5

SOC 2

Official resources

International Traffic in Arms Regulations (ITAR) – Part 120 Defines key terms and definitions for compliance with ITAR regulations. ecfr.gov/current/title-22/chapter-I/subchapter-M/part-120	U.S. Department of State Directorate of Defense Trade Controls Provides official guidance and resources related to ITAR compliance. pmddtc.state.gov
ITAR Compliance Guidelines Outlines compliance responsibilities for organizations managing export-controlled items. pmddtc.state.gov/ddtc_public?id=ddtc_kb_article_page&sys_id=ff32c47fdb75d300d0a370131f961989	Defense Trade Controls Overview Describes the framework and structure of U.S. Defense Trade Controls. pmddtc.state.gov/ddtc_public?id=ddtc_kb_article_page&sys_id=6753ac47db15d300d0a370131f9619bb

Frequently asked questions

- What is U.S. ITAR Part 120 used for?**
U.S. ITAR Part 120 provides the foundational definitions for terms used throughout the International Traffic in Arms Regulations. Organizations rely on these definitions to accurately classify defense articles, services, and technical data, ensuring compliance with U.S. export control laws.
- Is compliance with ITAR Part 120 mandatory?**
Yes, compliance with ITAR Part 120 is mandatory for entities engaging in the export, import, or transfer of defense-related items falling under ITAR jurisdiction. Failure to apply these definitions correctly can lead to misclassification and significant regulatory penalties.
- What is the scope of ITAR Part 120?**
The scope of ITAR Part 120 includes definitions and terminology essential for the interpretation and application of all subsequent ITAR parts. It applies to all U.S. and non-U.S. entities dealing with controlled defense items, providing clarity on what is subject to ITAR.
- What key concepts or artifacts are defined in ITAR Part 120?**

How should organizations implement ITAR Part 120 requirements?

Organizations should integrate ITAR Part 120 definitions into risk assessments, product classification workflows, and policy frameworks. Proper implementation involves training staff, applying strict access controls, and documenting classification and compliance decisions based on these definitions.

How does ITAR Part 120 relate to other compliance frameworks?

ITAR Part 120 definitions impact compliance with the broader ITAR requirements as well as intersecting export control and security regulations such as the Export Administration Regulations (EAR). Accurate application of these definitions is vital for harmonizing compliance programs across multiple regulatory regimes.

What are the ongoing compliance requirements under ITAR Part 120?

Ongoing compliance requires organizations to periodically review and update asset classifications, access controls, and supporting documentation according to the latest ITAR definitions. Continuous monitoring for regulatory changes and staff training are also essential aspects of sustained compliance.

How would SmartSuite support U.S. ITAR Part 120?

SmartSuite can help organizations manage ITAR Part 120 compliance by enabling risk tracking, mapping control requirements to operational processes, and supporting evidence collection for audits. The platform facilitates policy management, provides dashboards for regulatory reporting, and streamlines ongoing compliance through automated reminders and remediation workflows.

License included / downloadable: Yes ITAR is published by the U.S. Department of State and is publicly available via the Electronic Code of Federal Regulations (eCFR). License included with platform

Full framework page and mappings: smartsuite.com/frameworks/us-itar-part-120-limited-scope-international-traffic-in-arms-regulations-definitions