Export Compliance Review Flow Chart

1. Is the equipment, software, chemical, bio-agent, or technology on the (ITAR) US Munitions List (USML)?
   - Yes → MAY BE SUBJECT TO EXPORT CONTROL REGULATIONS
   - No → Is the equipment, software, chemical, bio-agent, or technology designed or modified for military use, use in outer space, or is there reason to know it will be for/in weapons of mass destruction?
     - Yes → MAY BE SUBJECT TO EXPORT CONTROL REGULATIONS
     - No → Is the equipment, software, chemical, bio-agent, or technology on the EAR Commerce Control List (CCL)?
       - Yes → MAY BE SUBJECT TO EXPORT CONTROL REGULATIONS
       - No → Does the contract contain a restriction on export or foreign national participation? If yes, the Fundamental Research Exclusion (FRE) is lost
         - Yes → MAY BE SUBJECT TO EXPORT CONTROL REGULATIONS
         - No → Is there encryption/encrypted software involved?
           - Yes → MAY BE SUBJECT TO EXPORT CONTROL REGULATIONS
           - No → Is the technology outside of the public domain?
             - Yes → MAY BE SUBJECT TO EXPORT CONTROL REGULATIONS
             - No → Does the contract or grant restrict publication or the presentation of research results?
               - Yes → MAY BE SUBJECT TO EXPORT CONTROL REGULATIONS
               - No → Does the contract or grant prohibit results or deliverables from being disclosed to any foreign country, foreign entity, or foreign person?
                 - Yes → MAY BE SUBJECT TO EXPORT CONTROL REGULATIONS
                 - No → Will there be foreign nationals from or travel to an embargoed country?
                   - Yes → MAY BE SUBJECT TO EXPORT CONTROL REGULATIONS
                   - No → Will technology be exposed to foreign nationals (even on campus) or is foreign travel involved?
                     - Yes → MAY BE SUBJECT TO EXPORT CONTROL REGULATIONS
                     - No → Is the equipment, software or technology on the Commerce Control List (CCL)?
                       - Yes → MAY BE SUBJECT TO EXPORT CONTROL REGULATIONS
                       - No → MOST LIKELY NOT SUBJECT TO EXPORT CONTROLS

Contact: VUMC Export Compliance Office
https://ww2.mc.vanderbilt.edu/globalsupport/50084