Export Controls Compliance Review Flow Chart

Is the equipment, software, chemical, bio-agent, or technology on the (ITAR) US Munitions List (USML)?

- **NO**
- **YES**

- 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 or in weapons of mass destruction? Screen using ListVUE or other similar compliance tool.

- **NO**
- **YES**

- Is the equipment, software, chemical, bio-agent, or technology on the (EAR) Commodity Control List (CCL)? ListVUE is available to assist in screen tool.

- **NO**
- **YES**

Does the contract contain a restriction on export or foreign national participation? If yes, the Fundamental Research Exclusion (FRE) is lost

- **NO**
- **YES**

- Is there encryption/encrypted software involved?

- **NO**
- **YES**

- Is the technology outside of the public domain?

- **NO**
- **YES**

- Does the contract or grant restrict publication or the presentation of research results?

- **NO**
- **YES**

- Does the contract or grant prohibit results or deliverables from being disclosed to any foreign country, foreign entity, or foreign person?

- **NO**
- **YES**

Will technology be exposed to foreign nationals (even on campus) or is foreign travel involved?

- **NO**
- **YES**

- Is the equipment, software and technology (or information or instruction of same) on the Commodity Control List (CCL)?

- **NO**
- **YES**

Will there be foreign nationals from or travel to an embargoed country?

- **NO**
- **YES**

Most Likely Not Subject to Export Controls

MAY BE SUBJECT TO EXPORT CONTROL REGULATIONS
Contact: Vanderbilt Export Compliance vec@vanderbilt.edu
www.vanderbilt.edu/exportcompliance

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