Export Compliance Review Flow Chart

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

- 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?
  - NO
    - Is the equipment, software, chemical, bio-agent, or technology on the EAR Commerce Control List (CCL)?
    - NO
      - Does the contract contain a restriction on export or foreign national participation? If yes, the Fundamental Research Exclusion (FRE) is lost
      - NO
        - Is there encryption/encrypted software involved or is the technology outside of the public domain?
        - NO
          - Are any of the Tier 1 or 2 countries of concern involved? [https://www.vumc.org/globalsupport/countries]
          - NO
            - Does the contract or grant restrict publication, dissemination, or the presentation of research results?
            - 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
                - Contact: VUMC Export Compliance [https://www.vumc.org/globalsupport/exportcompliance]
              - NO
                - NO
                  - WILL THERE BE FOREIGN NATIONALS FROM OR TRAVEL TO AN EMBARGOED COUNTRY?
                  - NO
                    - IS THE EQUIPMENT, SOFTWARE OR TECHNOLOGY ON THE COMMERCE CONTROL LIST (CCL)?
                    - NO
                      - YES
                        - MOST LIKELY NOT SUBJECT TO EXPORT CONTROLS
                      - NO
                        - YES
                          - WILL TECHNOLOGY BE EXPOSED TO FOREIGN NATIONALS (EVEN ON CAMPUS) OR IS FOREIGN TRAVEL INVOLVED?
                          - YES
                            - MAY BE SUBJECT TO EXPORT CONTROL REGULATIONS
                            - Contact: VUMC Export Compliance [https://www.vumc.org/globalsupport/exportcompliance]
                          - NO
                            - NO
                              - YES
                                - WILL THERE BE FOREIGN NATIONALS FROM OR TRAVEL TO AN EMBARGOED COUNTRY?