

Research & Export Compliance

Vanderbilt University Export Compliance (VEC)

As a researcher, it is important to know when export controls apply and when they do not. Applicability depends on many factors like the type of research conducted, foreign national participation, acceptance of export controlled information, acceptance of sponsor restrictions, international travel and shipments, and more. Protect yourself and your research by staying educated on export controls.

Most academic research is excluded from export controls due to the **Fundamental Research Exclusion (FRE)**. The FRE is an exclusion that precludes research in the science, engineering, and mathematics when it is published or shared broadly with the scientific community. This allows university-based research that might otherwise be controlled for export by either the EAR or ITAR to be excluded.

The FRE applies only to information, not physical items or activities that occur outside of the US. The FRE may be negated by accepting restrictions on publication or foreign national participation or access.

Research Considerations

What is coming in?	What are we doing?	What is going out?
<p>Incoming Information</p> <ul style="list-style-type: none"> Publically available information is NOT controlled Sponsor's proprietary information MAY be controlled Sponsor provided export controlled information IS controlled <p>Incoming Physical Items</p> <ul style="list-style-type: none"> Physical items DO NOT qualify for the FRE and are subject to export Most basic, commercially available goods do not require an export license 	<p>Research IS subject to export controls when there are,</p> <ul style="list-style-type: none"> Publication restrictions Participation restrictions based on nationality Dissemination restrictions, limiting who can access <p>Activities occurring outside the US MAY be controlled.</p> <p>Examples,</p> <ul style="list-style-type: none"> Field research abroad Foreign Shipments 	<p>Outgoing Information</p> <ul style="list-style-type: none"> Publically available information is NOT controlled Information resulting from a non-FRE project, it MAY be controlled <p>Outgoing Physical Items</p> <ul style="list-style-type: none"> All physical deliverables created DO NOT qualify for the FRE and are subject to export
Contact VEC for all research concerns.		

Examples:

If incoming information is public without VU restrictions, then output is NOT controlled.

If incoming information is public with a VU publication restriction, then output MAY be controlled.

If incoming information is export controlled, regardless VU actions, then output IS controlled.

Vanderbilt Export Compliance (VEC)
 vec@vanderbilt.edu
<https://www.vanderbilt.edu/exportcompliance/>
 615-343-2426 or 615-343-6070

* VUMC departments should contact the VUMC Export office for all export matters:
<https://ww2.mc.vanderbilt.edu/globalsupport/50084>

