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ITAR Registered vs ITAR Compliant: What Each Claim Proves

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Published by Docket · 2026-11-17 · itar registered vs itar compliant · itar certified · ddtc registration · itar registration vs license · itar due diligence · defense contractor due diligence · private equity defense screening · itar authorized · supplier claim verification

Original article: https://docket.capital/articles/itar-registered-compliant-authorized-claim-matrix



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Executive Summary

A mandate field that reads "ITAR certified" bundles four different legal and commercial objects into one pass/fail flag. This report separates them. **ITAR registration** is a filing with the State Department's Directorate of Defense Trade Controls (DDTC), required of persons in the business of manufacturing, exporting or temporarily importing defense articles, or furnishing defense services (www.ecfr.gov). A manufacturer must register even if it never exports (www.researchsecurity.pitt.edu). The regulation says registration is primarily a means of giving the US Government information, and that it confers no export rights or privileges (www.ecfr.gov) (www.trade.gov).

Compliance is a different object. DDTC's Compliance Program Guidelines (version 1.1, tracked at September 19, 2023) state that registration does not constitute a certification of ITAR compliance (deccs.pmddtc.state.gov). The officer's "certification" in 22 CFR 122.2 is a statement filed by a senior officer with the registration, not a government finding that controls work (www.ecfr.gov). **Authorization** is a third object: a license, agreement or exemption for a specific activity, which registration generally precedes but does not replace (www.trade.gov) (www.ecfr.gov).

Public evidence is thin on all of this. LegalClarity, a practitioner guide, states that no searchable public registry exists (legalclarity.org), and DDTC tells registrants that codes should not be made available publicly (deccs.pmddtc.state.gov). A comprehensive official public lookup was not established in this research. A website badge therefore supports, at most, a claim by an identified entity that needs a dated document and a stated scope behind it.

The practical consequence for private-equity origination is to split one field into at least four: registration, claimed compliance, manufacturing capability and activity-specific authorization. A registration letter names an entity and a period (deccs.pmddtc.state.gov); whether an operating subsidiary is covered is a question about the filing itself (www.ecfr.gov), not about the parent's badge. Approximately 14,500 DDTC registrants were cited in an April 2024 State Department notice (www.federalregister.gov), and DDTC has said fewer than half of registrants apply for a license in any given year (deccs.pmddtc.state.gov), so registered status alone does not separate active defense exporters from non-exporting manufacturers.

This report supplies a claim-to-evidence matrix, a fictional screen (labelled as such), a ledger specification and a documentary support rate. It is a screening protocol, not export advice. Interpretation of scope, classification and authorization belongs with a qualified specialist. All regulatory text was read as displayed on eCFR on November 17, 2026, and should be rechecked on use.

Introduction and Background

Defense and aerospace manufacturers routinely display phrases such as "ITAR registered," "ITAR compliant" and "ITAR certified" on websites, capability statements and directories. Origination analysts who build mandate gates often transcribe these phrases into a single yes/no field. The risk is not that the badges are always wrong. The risk is that the field name asserts more than the evidence beneath it can support, so a filter built on it silently converts a marketing label into a legal conclusion.

The International Traffic in Arms Regulations (ITAR) implement the Arms Export Control Act (AECA), and the items the Secretary of State designates for control constitute the US Munitions List (USML) (www.ecfr.gov). This report uses the regulation as displayed on the eCFR; the version retrieved for this report showed a currency date of November 13, 2026.

Three features of the market make the confusion durable. First, the plain-language trade press has long corrected the label: LegalClarity states that the accurate term is ITAR registration (legalclarity.org), and a January 2026 law-firm article describes registration as "necessary, but not sufficient" (www.jdsupra.com). Corrections already exist, so this report does not claim to have discovered the distinction. The gap it addresses is translation: converting those source limits into fields, evidence types and hold/escalate rules that a research manager can embed in a mandate.

Second, the audience for the search language is probably suppliers and compliance staff rather than private-equity buyers, so most guidance explains how a supplier proves or obtains status, not how an outside analyst should record what a public badge shows. The legal object is also narrow: registration is a status held by an identified person for a period, and DDTC states there are three registration types: manufacturer, exporter and broker (deccs.pmddtc.state.gov).

Docket is a deal-origination and evidence-backed acquisition target research platform and service for private-equity firms. Its relationship to this topic is adjacent: it designs evidence fields and screening workflows, and it is not a regulator, a law firm or an export compliance provider. Nothing here is legal advice, and no document request or outreach is initiated by this article.

Taxonomy: What Each Public Claim Literally Asserts

The first discipline is to record the literal words on the page, the claimant and the date, and then decline to upgrade them. The phrases that appear in supplier marketing fall into five families, summarized in *Table 1* below. Each row pairs a plain-language definition with what the primary sources say and what the phrase does not show. The definitions are working vocabulary for screening and do not substitute for current law.

Term	What it can mean	What the sources support	What it does not show
ITAR registered	An entity filed a Statement of Registration with DDTC and holds a registration code and letter.	Registration is required of persons in the business of manufacturing, exporting or temporarily importing defense articles; DDTC says registrants receive a code matching their type and a completion letter (deccs.pmddtc.state.gov).	Export rights, compliance, capability or coverage of every group company (www.trade.gov).
Officer filing certification	A senior officer's certification included in the Statement of Registration.	22 CFR 122.2 requires a certification by an authorized senior officer of listed matters, including whether the registrant is foreign owned or controlled (www.ecfr.gov).	A government finding that the company's controls work. DDTC states registration is not a certification of compliance.
ITAR compliant	A self-described claim that the entity follows ITAR rules; also used for tools and hosting.	DDTC says it strongly advises parties in defense trade to maintain a compliance program (www.pmddtc.state.gov).	Independent verification. The DDTC pages reviewed for this report do not define "ITAR compliant" as a status.
ITAR certified / training certificate	Usually a course completion record from a third-party trainer, or a colloquial label for registration.	LegalClarity treats the colloquial label as meaning registration. Training is one of DDTC's listed program elements (deccs.pmddtc.state.gov).	A DDTC credential. A training record describes an individual's course, not the entity's registration or controls.
ITAR authorized	Permission for a particular activity, such as a license, agreement or exemption.	A license permits a specific export, temporary import or brokering; an agreement can authorize defense services (www.trade.gov); an exemption authorizes an activity without a license.	Anything outside the named activity, counterparty, article and period.

Table 1 shows that only the first row maps to a filing with a government counterparty, and that the second row is a component of the first. The remaining rows are claims whose evidentiary basis is private (a compliance program), commercial (a trainer's certificate) or activity-specific (an authorization). A mandate field named "ITAR certified" invites a reviewer to treat the second, third or fourth row as proof of the fifth. DDTC's guidance states that the AECA and ITAR prevail in a conflict (deccs.pmddtc.state.gov), so for screening, current regulation controls, guidance explains, and marketing language has no standing.

Other badges that travel with the ITAR badge

Suppliers frequently display other credentials next to the ITAR phrase. These are distinct claim types and should be recorded in separate fields; none establishes ITAR registration.

- **Cybersecurity Maturity Model Certification (CMMC).** DoD describes CMMC as designed to enforce protection of Federal Contract Information and Controlled Unclassified Information (dodcio.defense.gov). A DoD page displayed a banner stating that Phase II requirements, originally scheduled for November 10, 2026, were suspended (dodcio.defense.gov). The page dates the suspension to July 13, 2026, so its status should be rechecked at use.

- **ISO and AS9100 quality management certificates.** ISO states that it does not perform certification or issue certificates (www.iso.org); certification is performed by external certification bodies (www.iso.org). The International Aerospace Quality Group (IAQG)'s OASIS database lists suppliers certified or registered under its rules to aerospace quality management requirements (iaqg.org). This is a different, verifiable certificate object.
- **Facility clearance.** The Defense Counterintelligence and Security Agency (DCSA) says entities involving access to or creation of classified information may be granted a Facility Clearance (www.dcsa.mil), and contractors cannot sponsor themselves (www.dcsa.mil). This concerns classified access, not export registration.
- **Joint Certification Program (JCP).** The Defense Logistics Agency says JCP certifies US and Canadian entities to access unclassified military technical data (www.dla.mil). DLA's JCP guide treats a DDTC registration letter as a separate input to the application (www.dla.mil).

These items are not verified here and appear only so that a mandate does not collapse them into the ITAR field.

What Registration Establishes, and What the Text Says It Does Not

The bounded purpose of registration

Section 122.1 states that a person engaged in the United States in the business of manufacturing, exporting or temporarily importing defense articles, or furnishing defense services, must register with DDTC. A manufacturer that does not export must nevertheless register, and a university export office confirms that registration is required even when the activity does not involve an export (www.researchsecurity.pitt.edu).

The rule also states the purpose: registration is primarily a means to provide the US Government with necessary information, and it does not confer any export rights or privileges. The Department of Commerce's International Trade Administration handbook likewise says registration does not grant export or temporary import rights or privileges. That handbook's file name says 2025, while its running footers read "2024 ITA Defense Export Handbook" (www.trade.gov), so this report treats it as supporting reference material for a 2024 edition and not as a 2026 rule source.

Registration is generally a precondition, which is not the same as permission

The regulation and the ITA handbook both call registration generally a precondition to the issuance of any license or other approval (www.ecfr.gov) (www.trade.gov). The license rule requires an applicant to be registered with DDTC (www.ecfr.gov). A precondition is a gate to apply, not a grant. A university export office describes the sequence plainly: once registration is complete, an exporter may apply for an export authorization (www.researchsecurity.pitt.edu). Brokering follows a parallel logic, and DDTC states that registering as a broker does not authorize a person to export, reexport or retransfer (deccs.pmddtc.state.gov).

Exemptions from registration do not remove licensing

Section 122.1 exempts, for example, persons whose pertinent business activity is confined to producing unclassified technical data only (www.ecfr.gov). A missing registration letter is therefore an observation that needs a specialist's reading of exemptions and classification, not a conclusion about conduct or about defense work.

The word "certification" inside the filing

Section 122.2 provides that the Statement of Registration must include a certification by an authorized senior officer of listed matters. One listed matter asks whether the intended registrant is foreign owned or foreign controlled. These are statements about eligibility and ownership. The matrix later in this report gives the roles side by side; the key reading here is that the officer certifies facts in a filing, DDTC processes the filing, and neither step is a government assessment of whether the company's operations comply.

Entity Scope and Time: Whose Registration, For How Long

The named entity is the unit of analysis

A registration code is an identifier unique to a specific entity (deccs.pmddtc.state.gov). For acquisition screening this matters in two directions. A parent's letter does not by itself describe an operating subsidiary, and a subsidiary's marketing page may borrow a parent's badge. The regulation permits a Statement of Registration to include subsidiaries and affiliates, and DDTC's instructions say that entities with shared ownership or control generally may not register separately (www.pmddtc.state.gov). Taken together, the sources suggest that coverage is a question of what the filing lists, not of what a group's website implies.

The control concept is also defined: Section 120.66 states that control is rebuttably presumed where ownership reaches 25 percent or more of outstanding voting securities (www.ecfr.gov). Ownership thresholds serve different purposes in different rules, so affiliate coverage should go to a specialist and not be inferred.

Codes, letters and what each document shows

Three documents are commonly confused:

- **Registration code.** DDTC says registrants receive a code corresponding to their registration type, and the code is an identifier unique to one entity.
- **Completion or acknowledgement letter.** DDTC issues a completion letter with the code; the letter is the natural dated document to reconcile against a claim.
- **Public web statement of a code.** DDTC advises that codes are specific to the registrant and should not be made available publicly, so a printed code is a claim to be reconciled against a document, and the absence of a code on a public page is not evidence of unregistered status.

LegalClarity states that confirming active status requires both the code and the expiration date (legalclarity.org), and that references on a supplier's website are not proof of current registration (legalclarity.org). That page is a practitioner guide, and its displayed publication date varied between retrievals,

so it supports only the observation about verification practice. Purdue's export control office adds that contractors often require universities to verify their DDTC registration status (research.purdue.edu), which indicates routine peer exchange of registration evidence, not a public registry.

Registration period and renewal

DDTC states that registrations are valid for 12 months and must be renewed annually. A dated letter is therefore evidence about a window, not a standing property of a company. Three time fields should be kept apart:

- **Document date.** When the letter or statement was issued.
- **Validity window.** The 12-month period the document describes.
- **Review date.** When the analyst observed it.

Ownership changes and acquisitions

Section 122.4 imposes notification duties on registrants for changes in information furnished (www.ecfr.gov). DDTC's amendment page lists a distinct category for mergers, acquisitions and divestitures, and a notification must list the registration codes of all involved parties (www.pmddtc.state.gov). DDTC's FAQ explains that, where one registrant acquires another, DDTC folds the seller under the buyer's surviving registration (www.pmddtc.state.gov). This report does not state deadlines, which are time-sensitive and belong in specialist advice. The screening implication is simpler: a pre-closing registration letter for a target may be superseded after a transaction, so the ledger should record whether the document predates a restructuring.

Authorization and Operational Compliance Are Separate Fields

Activity-specific authorization

The ITAR distinguishes registration from approval for particular activities. The International Trade Administration handbook says that, generally, DDTC must approve any person intending to export, reexport, retransfer or temporarily import defense articles (www.trade.gov). A license permits a specific transaction; an agreement can authorize defense services (www.trade.gov); and an exemption is defined as a provision that authorizes an activity without a license or other written authorization. DDTC has reported that fewer than half of registered entities are likely to apply for a license in a given year, which is consistent with a registered population that includes non-exporting manufacturers.

Authorization is also bounded by classification. The regulation's definition of "defense article" reaches unfinished items such as forgings and castings once they are clearly identifiable by mechanical properties, material composition, geometry or function as defense articles (www.ecfr.gov). For a component supplier, whether a given part sits inside or outside the USML is therefore an engineering and legal determination. The handbook notes that applicants need not be registered to submit a commodity jurisdiction request (www.trade.gov), which illustrates that classification questions can be raised independently of registration status.

An analyst should not draw any of these conclusions from a public badge. A research field called "authorized" should name the activity, the instrument type (license, agreement, exemption), the counterparty or destination class and the period, and it will usually be empty in public data.

Operational compliance: a program, not a badge

DDTC states that it strongly advises parties engaged in defense trade to establish and maintain an ITAR and export compliance program. The Guidelines identify the elements it regards as critical for an effective program, including registration and authorizations as one element among several. The handbook likewise tells registered parties to maintain compliance programs that assist in the monitoring and control of exports (www.trade.gov) and points to the DDTC guidance (www.trade.gov). These sources characterize a compliance program as internal policies and procedures, which are private documents. Public marketing can claim a program exists; it cannot show that it works. DDTC says registration does not indicate program effectiveness.

For acquisition diligence, Sidley's summary of the 2022 guidelines says diligence reviews should assess the effectiveness of the target's ITAR compliance program (www.sidley.com). A law-firm alert adds that targets must maintain adequate policies and procedures to classify their items (www.gibsondunn.com). These process statements explain why the matrix assigns program-level questions to a specialist reviewer and not to the origination team.

"ITAR compliant" tools are a separate claim again

Software and cloud vendors also advertise "ITAR compliant" hosting. The only regulatory hook found in this research is Section 120.54, which lists activities that are not exports, reexports, retransfers or temporary imports (www.ecfr.gov). It is a carve-out defined by conditions, not a government certification of a product, and a tool's badge says nothing about the registration status of the company using it.

The Claim-to-Evidence Matrix

Table 2 below is the core reference asset. It lists the mandate field a researcher might create, the literal public assertion, what the assertion can support, the inference that remains unsupported, and who should take the next step. Its rows are generic and use no real companies. The ledger fields that attach to every row appear after the table.

Mandate field	Literal assertion	Supported conclusion (if a dated document is on file)	Unsupported inference	Reviewer and next action
Registration status	"ITAR registered" on a website or capability statement.	A named entity claims registration. A dated DDTC letter, if provided through an approved channel, supports registration for that entity and period.	That the claim covers affiliates, applies today, or implies compliance.	Origination analyst records claim and entity; specialist reviews letter, code, expiration and filing scope.
Officer filing certification	"Certified by our senior officer" or a quoted certification clause.	A senior officer certified listed matters in a filing.	A government finding of effective controls.	Specialist confirms the filing context; analyst records as a status attestation only.

Mandate field	Literal assertion	Supported conclusion (if a dated document is on file)	Unsupported inference	Reviewer and next action
Claimed compliance	"ITAR compliant," "fully compliant," a policy page.	The entity asserts a program exists.	That the program is implemented, tested or effective.	Specialist, through approved diligence channels, assesses program elements and effectiveness (www.sidley.com).
Training certificate	Course completion record for an individual.	A named person completed a named course on a stated date.	Entity registration, program coverage or authorization.	Analyst records issuer and date; no entity-level inference.
Manufacturing capability	Machine lists, material certifications, AS9100 or Nadcap logos.	Capability claims plus separate quality credentials where verifiable (iaqg.org) (www.p-r-i.org).	That the part is a defense article, that export is authorized, or that registration exists.	Operations diligence for capability; specialist for jurisdiction and classification.
Activity authorization	"We hold ITAR licenses."	The entity claims authorizations of an unspecified type.	That a particular activity, article, destination and period is covered.	Specialist reviews the instrument; analyst leaves the field blank unless a document is supplied.

The matrix intentionally leaves "pass" and "fail" out. Each row supports a bounded conclusion and records the inference a reviewer is tempted to make. The right-hand column assigns the next action to a role, which keeps analysts from drifting into interpretation of exemptions or classification. Where the documentary basis is a public page, the supported conclusion is limited to "claimed."

Ledger fields

A blank claim ledger gives each row the same shape:

- **Mandate field and literal assertion.** The exact words on the page, unedited.
- **Claimant legal entity.** The entity named on the document, not the brand or parent.
- **Document issuer, type and dates.** DDTC letter, officer statement, trainer certificate or none; observed date and retrieval date.
- **Source URL and excerpt.** Location plus a short verbatim excerpt, and the source date.
- **Registration period and type.** Manufacturer, exporter or broker, and the validity window.
- **Covered entities if evidenced.** Affiliates listed in the document, not inferred from group structure, plus related entity evidence.
- **Supported conclusion and unsupported inference.** Two separate cells, as in *Table 2*.
- **Reviewer and next action.** Origination analyst, research manager, approved diligence provider or qualified specialist.

The documentary support rate

For mandate reporting, define the **documentary support rate** as the number of claims supported for the specified entity and period divided by the number of claims reviewed. Report alongside it a separate **unresolved-scope count** (claims whose entity or period cannot be reconciled) and an **unavailable-document count** (claims for which a document was requested through approved channels or expected but not provided). Do not label the figure a compliance rate, defense-market coverage or a regulatory approval rate. It measures only how many public claims in a given review set have a matching document for the stated entity and period. This article offers no illustrative percentage, because none would be an empirical result.

A fictional screen (Hypothetical Example)

The following example is fictional and does not describe any real company, transaction or document. A screening team reviews a hypothetical target, "Northgate Precision Components LLC," an operating subsidiary of a hypothetical group, "Northgate Holdings Inc." The team finds four public items and assesses the registration letter on two separate questions, so *Table 3* has five rows. It uses five labels: claimed, documented but scope unresolved, expired or superseded evidence, inapplicable, and requires qualified review.

Item (fictional)	Claimant and date	Classification	Reason
Website badge reading "ITAR Certified" on the subsidiary's homepage	Subsidiary, undated	**Claimed**	The phrase is not a status DDTC defines; record the literal words and the entity, and decline to read it as registration.
Parent's registration letter, dated eighteen months before review	Holdings, dated	**Expired or superseded evidence**	Registrations run 12 months and must be renewed annually; an old letter shows a past window only.
Same letter, for the period in which it was valid	Holdings, dated	**Documented but scope unresolved**	The letter names the parent; whether the filing lists the operating subsidiary as an affiliate is a filing question.
Employee course completion certificate for an ITAR awareness class	Trainer, individual	**Inapplicable** to entity registration or authorization	It describes an individual's training, which is a program element and not a status.
Statement that the firm "holds licenses" without instrument details	Subsidiary	**Requires qualified review**	Instrument type, article, destination and period are unknown.

Table 3 does not conclude that the fictional target is compliant or non-compliant. It shows how four public items generate five different evidence states, and why none of them equals a pass. Notably, the second and third rows describe the same document. The date and the entity are separate dimensions, and a document can be current for one question and irrelevant for another. A missing public match is not evidence of anything either: DDTC advises registrants not to publish codes, so silence on a page is a limit of the sample.

Data Analysis and Evidence

The quantitative context for this topic is modest and must be read as context for screening design, not as a market-size claim. Every figure below is attributed to its originator and dated.

Registered population and licensing activity

- **Registrant count.** A State Department notice published April 24, 2024 states DDTC has approximately 14,500 current registrants (www.federalregister.gov). A separate DDTC page, undated, refers to over 13,000 entities currently registered. The figures differ in date and wording, so neither should be used as a live roster size.
- **Licensing activity.** The same State Department notice says DDTC received approximately 22,500 license applications in fiscal year 2022 (www.federalregister.gov). DDTC's end-use monitoring report for fiscal year 2019 states that DDTC authorized 36,754 export license applications (www.pmddtc.state.gov). The two figures describe different measures (received versus authorized) and different years, and cannot be compared as a trend.
- **Registrant composition.** The April 2024 notice describes the lowest fee tier as including manufacturers who either do not export or who rely on ITAR exemptions for export authorizations (www.federalregister.gov). The notice thus recognizes registrants that do not apply for licenses. This report states no fee amounts.

The practical reading is that a registered population on the order of 13,000 to 14,500 sits behind a license-application flow of roughly 22,500 received applications in one year, and that DDTC itself says fewer than half of registrants are likely to apply for a license in any year. These figures do not support a ratio of licenses to registrants, since applications can be concentrated among a few registrants.

Why export-control diligence is a deal topic

PwC reports that global aerospace and defense deal value rose from roughly $27 billion in 2024 to in excess of $30 billion in 2025 (www.pwc.com), and says export controls, ITAR and national security reviews will make diligence and integration planning central to value creation (www.pwc.com). A Bain and Aerospace Industries Association release reports that defense-focused PE buyout volume has held at roughly $1 billion to $3 billion a year (www.bain.com). A Ropes and Gray October 2026 report says sponsors who treat national-security diligence as foundational are best positioned to close and exit cleanly (www.ropesgray.com). These are advisor or association views of the sector, not evidence about any specific company's status.

The Government Accountability Office reported that the number of small businesses receiving DoD contract awards decreased from 42,723 in 2011 to 24,296 in 2020, a decline of 43 percent (gao.gov). CFIUS reported that it reviewed 166 covered transactions involving critical technology companies in calendar year 2025 (www.cfius.gov), and its critical technology definition includes defense articles and services on the USML (www.cfius.gov). Neither figure measures registration prevalence. No source examined counts entities displaying "ITAR certified" badges or measures how many badges match current registrations, which is a reason to keep the badge a claim until documented.

Verification Routes, Limits and Common Questions

What can be verified from public pages

The reliable public sources are the regulations and DDTC's own pages. A reviewer can verify what registration means, what the officer certification is, what the registration types are and that codes are not published. A reviewer cannot, from public pages alone, verify a given company's status, scope or program. A practitioner guide reports that no public database lists every ITAR-registered company; the claim rests on that guide and on DDTC's advice to protect codes, and it has not been independently established here as a universal official fact. If a lawful route exists, it will run through documents supplied by the company or through the specialist's own channels. This report does not request documents or initiate outreach.

Frequently Asked Questions (FAQs)

What does "ITAR registered" mean?

It means an identified entity has filed a Statement of Registration with DDTC, as the regulation requires of persons in the business of manufacturing, exporting or temporarily importing defense articles. Registration provides government information and confers no export rights or privileges.

ITAR registered vs ITAR compliant: what is the difference?

Registration is a filing status. Compliance describes whether an entity's activities and controls conform to the regulations. DDTC states that registration does not constitute a certification of ITAR compliance or indicate the effectiveness of a compliance program. "ITAR compliant" on a web page is a claim by the entity.

ITAR registered vs certified vs authorized?

"Certified" is colloquial and, per one practitioner guide, usually means registered. An officer certifies matters inside the registration filing, and third parties may issue training certificates. "Authorized" should be reserved for activity-specific permission such as a license, agreement or exemption.

What is the difference between ITAR registration and a license?

Registration is generally a precondition to applying for a license or other approval (www.trade.gov). A license permits a specific export, temporary import or brokering activity.

How can a company's ITAR compliance be verified?

Public marketing cannot verify it. Compliance involves classification, authorizations, recordkeeping and a working program, most of which are private. DDTC's Guidelines say due diligence reviews of targets should assess program effectiveness (deccs.pmddtc.state.gov), and Sidley's summary says the same. Assign this to a qualified specialist through approved diligence channels. Registrants must maintain certain records for five years from the expiration of the license or other approval (www.ecfr.gov), available for inspection by DDTC; that record set is the registrant's own and is not public.

How is DDTC registration verified?

No comprehensive public lookup was established in this research. Practitioner guidance says verification relies on asking the company for its code and expiration date, and that website references alone are not proof. Counterparties commonly exchange registration evidence, as Purdue's office describes (research.purdue.edu). Record the document type, date and entity, and refer scope questions to a specialist.

What does "ITAR compliant" mean in supplier claims?

It is not a status DDTC defines in the pages reviewed. It can describe self-assessment, a hosted tool's configuration or a loosely used registration claim; LegalClarity notes that many companies described as ITAR compliant display registration status on their websites (legalclarity.org).

What belongs in an ITAR diligence checklist for an acquisition?

Advisors describe the following core topics:

- **Jurisdiction, classification and licensing requirements** (www.rsmus.com).
- **Systems, policies, procedures and related documents** (www.rsmus.com).
- **Program effectiveness**, including whether licensing reviews and audits exist (www.sidley.com).
- **Deal timeline** room for registration, notification and transfer requirements (www.gibsondunn.com).

These are advisor descriptions, not a complete legal checklist. The origination team's role is limited to recording public claims and routing the rest.

How should private-equity teams screen defense-sector targets on this topic?

Treat registration, claimed compliance, capability and authorization as four fields, record the claimant entity and date for each, and hold or escalate any item where scope, period or activity is unresolved.

Implications and Future Directions

Redesigning the mandate field

Replace a binary "ITAR certified" gate with separate observations, each with a source, an entity and a date. Registration is the only one that corresponds to a government filing, and even there the evidence is a letter held by the registrant. A mandate can say "registration claim documented for the named entity and period" as a soft criterion, and reserve any hard gate for a decision made after specialist review.

Hold and escalate rules

The matrix supports a small rule set that research managers can encode:

- **Hold** any record where the claimant entity differs from the target entity named in the mandate, until related-entity evidence is attached.
- **Hold** any record where the only evidence is a badge or marketing statement.

- **Escalate** any record where a document names a parent and the target is a subsidiary, because coverage depends on the filing.
- **Escalate** any record that predates an ownership change, since registration information changes are subject to notification and registrations may be consolidated.
- **Escalate** any question about classification, exemptions, authorization instruments or program effectiveness.
- **Never** convert a missing public match into an adverse conclusion; the sample limit is the public page, not the company.

What could change

Regulation and guidance are dynamic. DDTC's Guidelines carry a version tracker showing edits through September 19, 2023, and the ITA handbook is a 2024 edition by its own footers (www.trade.gov). The DoD cybersecurity page shows how quickly a related badge's phase dates can move (dodcio.defense.gov). Future work should recheck the eCFR text and DDTC pages on the day of use, and any authoritative DDTC description of third-party registration confirmation should replace the practitioner statements used here.

Limits of this protocol

No company registrations, transactions, licenses or private compliance programs were examined. All examples are fictional, and the report does not address penalties, fees or deadlines. Classification and internal compliance evidence remain the main uncertainties.

Conclusion

"ITAR registered" is a narrow, checkable claim about an identified entity and period. It is supported, if at all, by a dated DDTC letter and code, and the regulation says registration confers no export rights and is primarily a means of providing information to the government. "ITAR compliant" is a claim about conduct and controls that DDTC says registration does not certify. "ITAR certified" is mostly a colloquial label for registration, and a training certificate is a record of an individual's course. "ITAR authorized" belongs to activities with an instrument.

The screening protocol follows from that separation. Keep registration, claimed compliance, manufacturing capability and authorization as separate fields. Record the claimant entity, the document issuer, the date and the period. Do not assume a parent's letter covers an operating subsidiary. Report a documentary support rate with its unresolved-scope and unavailable-document counts, and never relabel it a compliance rate. Route interpretation of scope, classification, exemptions and program effectiveness to a qualified compliance specialist, and treat a missing public match as a limit of the sample.

Source links

Links cited in this article, in order of first appearance. Full addresses are provided for readers using extracted text.

1. https://www.ecfr.gov/current/title-22/chapter-I/subchapter-M/part-122
2. https://www.researchsecurity.pitt.edu/export-defense-articles-and-services-itar

3. https://www.trade.gov/sites/default/files/2025-01/2025%20Defense%20Export%20Handbook.pdf
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