

Determining Whether Substantial Transformation Occurred in the U.S.

Substantial transformation occurred in the U.S. if you are able to answer “Yes” to any of the following 3 questions:

Questions	Criteria	Sub questions	Yes	No
1. Were all of the components of the manufactured good manufactured in the United States, and were all of the components assembled into the final product in the U.S.?	Answer “Yes” to Question 1	N/A		
2. Was there a change in character or use of the good or the components in America? (These questions are asked about the finished good as a whole, not about each individual component)	Answer “Yes” to any of the three sub-questions	a. Was there a change in the physical and/or chemical properties or characteristics designed to alter the functionality of the good?		
		b. Did the manufacturing or processing operation result in a change of a product(s) with one use into a product with a different use?		
		c. Did the manufacturing or processing operation result in the narrowing of the range of possible uses of a multi-use product?		
3. Was(/were) the process(es) performed in the U.S. (including but not limited to assembly) complex and meaningful?	Answer “Yes” to any two of five sub-questions	a. Did the process(es) take a substantial amount of time?		
		b. Was(/were) the process(es) costly?		
		c. Did the process(es) require particular high level skills?		
		d. Did the process(es) require a number of different operations?		
		e. Was substantial value added in the process(es)?		