



# IMPACT OF U.S. SANCTION REGULATIONS ON RESEARCH AND TEACHING ACTIVITIES

## Examples of University Activities that MAY Require A License

- Collegial exchanges including research collaboration, advising and mentoring.
- Providing educational services to people in sanctioned countries.
- Exchange of research materials, such as samples or unpublished data.
- Providing or obtaining analytical services (e.g. gene sequencing, carbon dating, or composition analysis) even if there is no exchange of funds.
- Travelling to a sanctioned country for a University purpose or activity.
- Taking or sending University-owned equipment, software or supplies to a sanctioned country.
- Payments, donations, reimbursements, etc. from or to a party in a sanctioned country.
- Transfers of non-public technical information (e.g., controlled for export under the nuclear regulations, EAR, or ITAR) to a national of a sanctioned country

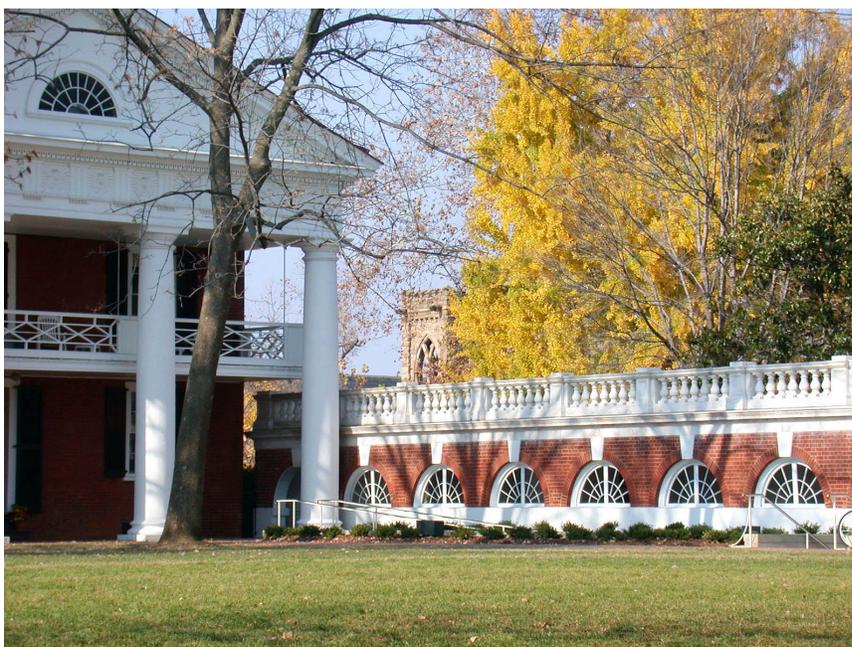
## OFFICE OF EXPORT CONTROLS

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## OVERVIEW

The Office of Foreign Assets Control (OFAC), U.S. Treasury Department, is responsible for the administration and enforcement of trade sanctions. Unlike other export control regulations, trade sanctions are not technology-based; rather, they exert control over a wide range of transactions and activities. Sanction programs may be either list-based and country-based but each is unique.

The list-based sanctions target illegal activities and entities (companies, organizations and individuals) that conduct and support them. Examples include, but are not limited to, the non-proliferation and counter-terrorism programs.

Country-based sanctions target governments or nations that represent a foreign policy or national security concern for the U.S. These sanctions may be limited in scope or comprehensive.

## SCOPE & STRUCTURE

Each sanction program provides a list of prohibited activities which is then qualified and refined by definitions and variety of exemptions. General licenses are provided in some programs to permit otherwise prohibited activities to proceed without further authorization in particular situations. No application is required to use a general license, but specific recordkeeping or reporting requirements may apply.

Activities not authorized by a general license may be allowable under a specific license, but applications for specific licenses must be reviewed and approved by OFAC.

## PROHIBITED ACTIVITIES

The following are examples of prohibited activities. In some cases, an exemption or general license may be available to overcome the prohibition.

**Exports** to a sanctioned country, including to nationals of such countries in the US or abroad, by or on behalf of a U.S. person. The prohibition applies regardless of the intended use and duration of the export. It also applies to both items and associated unpublished data regardless of country of origin.

**Imports** from the sanctioned country. As is the case with exports, imports are prohibited regardless of the intended use, duration of importation, and source of the item or information.

**Provision of services** by or on-behalf of a U.S. person to a sanctioned country, including to any person in a sanctioned country. Financial, research, testing and educational services are included in this prohibition.

**Receiving services** from a sanctioned country or any person in a sanctioned country is prohibited regardless of whether or not there is an associated payment.

**U.S. persons' involvement** in a transaction intended to benefit an entity in or the government of a sanctioned country.

## EXEMPT ACTIVITIES

The following are examples of activities that are generally exempt from the scope of country-based sanction regulations.

The importation and exportation of “**information or informational materials**” (fully created/published at the time of exchange) is allowed for sanctioned countries.

**Personal communications** are exempt from sanction control if they don't transfer anything of value. Educational instruction, mentoring and advising are considered services of value.

**Humanitarian donations** of food, clothing or medicine are allowed by the sanction regulations.

**Transactions ordinarily incident to authorized travel** including importing personal baggage, payment of living expenses, and acquisition of services or goods for personal use. However, payment or reimbursement by an entity within a sanctioned country may be prohibited.

**Transactions necessary and ordinarily incident to publishing.**

Activities in the U.S. specifically **authorized by a valid U.S. visa**. Authorized activities vary by visa type and sanction program.

## SANCTIONED COUNTRIES

The U.S. maintains comprehensive or near comprehensive programs of sanctions against the following countries: **Cuba, Iran, North Korea, Sudan and Syria**. In addition, the U.S. maintains the following limited or targeted country-based sanction programs: Ukraine-related (Russia), Burma (Myanmar), Democratic Republic of the Congo, Cote d'Ivoire-related, Somalia, Balkans-related, Iraq-related, Lebanon-related, Libya, Yemen-related, and Zimbabwe. As sanctions are subject to change, for an up-to-date list of both the country- and list-based sanction programs administered and enforced by OFAC, please visit their website (<http://www.treasury.gov/about/organizational-structure/offices/Pages/Office-of-Foreign-Assets-Control.aspx> )