

Guidance for Academic and Research Activities with Individuals Ordinarily Resident in Iran

In addition to prohibiting our engaging in activities with individuals and entities that appear on the U.S. Department of Treasury's Office of Foreign Assets Control's (OFAC's) list of Specially Designated Nationals and Blocked Persons, OFAC administers various U.S. sanctions. The most comprehensive sanctions prohibit, without OFAC authorization, providing certain services, technology, or goods to individuals and governments of those sanctioned countries.

See the following table for guidance on various academic and research activities.

ACTIVITY	CATEGORY	AUTHORIZED?	REGULATORY INFO
Working w/ J-1 (Visiting Scholar), F-1 (Student) Visa Holders Ordinarily Resident in Iran On-Campus	TEACHING RESEARCH	YES	Non-Immigrant Visa Holders Authorized to Carry Out Activities for which Visa Was Granted 31 C.F.R. § 560.505
Working w/ J-1, F-1 Visa Holders Ordinarily Resident in Iran After Return to Iran	TEACHING RESEARCH	MAYBE	OFAC Specific License Must Be Obtained by ECU Office of Export Controls unless certain conditions are met and the activity leads to a written publication
Providing Online Distance Education (including Massive Open Online Courses) UNDERGRADUATE courses in humanities, law, social sciences, business, or introductory undergraduate level science, technology, engineering, or math courses ordinarily required for UNDERGRADUATE DEGREE PROGRAM in humanities, law, social sciences, or business TO individuals ordinarily resident in Iran, but wherever currently located	TEACHING	YES	OFAC General License G



Guidance for Academic and Research Activities with Individuals Ordinarily Resident in Iran

ACTIVITY	CATEGORY	AUTHORIZED?	REGULATORY INFO
Providing Online Distance Education (including Massive Open Online Courses) GRADUATE courses, any field, TO individuals ordinarily resident in Iran, but wherever currently located	TEACHING	NO	OFAC Specific License Must Be Obtained by ECU Office of Export Controls
Working with Iranian Universities and their Faculty/Staff to organize formal Academic Exchange Agreements, undergraduate or graduate	TEACHING	YES	OFAC General License G
Journal Editor Routine, yet Substantive, Editing or Routine Peer Review with Intent to Publish	PEER REVIEW JOURNAL EDITOR	YES	31 C.F.R. § 560.538 OFAC Guidance on Certain Publishing Activities (October 28, 2016)
Providing Individualized Dissertation Editing or Non-Routine Peer Review, Co-authoring, or Providing Technical Assistance	INDIVIDUALIZED SERVICE	MAYBE	OFAC Specific License Must Be Obtained by ECU Office of Export Controls unless certain conditions are met and the activity leads to a written publication OFAC Guidance on Certain Publishing Activities (October 28, 2016)

Need Assistance?

Each regulation has many nuances. If you are uncertain whether or not your activity is authorized, or if you would like to engage in an otherwise prohibited activity, contact us at ECUExportControls@ecu.edu. The ECU Office of Export Controls and Customs can apply for specific OFAC licenses and provide additional guidance.

