

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

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
Providing ANY Online Distance Education (including Massive Open Online Courses) UNDERGRADUATE or GRADUATE TO individuals ordinarily resident in Syria, but wherever currently located	TEACHING	NO	31 C.F.R. § 542.207
Working with Syrian Universities and their Faculty/Staff to organize formal Academic Exchange Agreements, undergraduate or graduate	TEACHING	NO	31 C.F.R. § 542.207
Journal Editor Routine, yet Substantive, Editing or Routine Peer Review with Intent to Publish	PEER REVIEW JOURNAL EDITOR	YES	31 C.F.R. § 542.532 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	31 C.F.R. § 542.532 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



This document is provided as an informational aid.

It is not intended as legal advice.

Questions? Email ECUExportControls@ecu.edu

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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.

