



# Export Controls: Guidance on Iran Sanctions

The existing U.S. sanctions imposed against Iran are the strictest ones to date. The current [Iranian Transactions and Sanctions Regulations](#) were fully imposed on November 5, 2018 and are administered by the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC). Additionally, Iranian nationals are subject to strict export control restrictions and may require authorization from the Department of Commerce to have access to equipment, information, and/or research that are subject to export controls under the Bureau of Industry and Security.

If your research involves collaboration with, or travel or shipping to, an Iranian entity or individual(s), contact [compliance@usu.edu](mailto:compliance@usu.edu) for consultation.

## Education Services

Under General License G issued by OFAC, U.S. academic institutions are permitted to provide certain educational services and academic exchanges with Iranian universities and students. Iranian students may apply for non-immigrant visas to attend academic institutions in the U.S. Iranian students may also participate in undergraduate-level online courses provided by U.S. academic institutions in the humanities, social sciences, law or business that are the equivalent to courses ordinarily required for the completion of undergraduate degree programs in the humanities, social sciences, law or business — or in introductory-level science, technology, engineering, or math courses that are ordinarily required for the completion of undergraduate degree programs in the humanities, social sciences, law or business.

## Research Activities

Outside of the undergraduate and limited graduate-level research explained above, research collaborations between USU and Iranian entities remain restricted under OFAC's sanctions program. While certain research results may be exempt from export controls under the Fundamental Research exclusion, most of the mechanisms and activities involved in sharing this information and collaboration between a U.S.-based entity and an Iranian entity to conduct research are prohibited. The foundation for this prohibition is that, except for the education services explained above, a U.S. entity — including individuals operating under U.S. jurisdiction — is prohibited from providing services to Iranian entities — including individuals operating under Iranian authority. The nuances of these prohibitions are too many to list here, so if you are seriously considering a research endeavor involving an Iranian entity in any way, contact [compliance@usu.edu](mailto:compliance@usu.edu) for consultation.

OFAC has a licensing process whereby specific authorizations for a proposed research effort may be requested. Additional authorizations from the Department of Commerce, Bureau of Industry and Security (BIS) may also be required under certain circumstances. These processes are lengthy, in some cases taking more than a year, and there is a general policy of denial for these requests.

## **Shipping**

Physical shipments of goods from the U.S. to Iran are prohibited by both OFAC and Bureau of Industry and Security (BIS). Both agencies have mechanisms to apply for licenses to allow the export of items to Iran; however, each agency has a policy of denial for most cases. If a proposed export is in support of an approved activity in Iran (i.e., educational exchange), there is a better chance of obtaining approval.

Information and informational materials are generally permitted for shipment between the U.S. and Iran, provided that these materials do not contain information that is controlled for export under the Export Administration Regulations (EAR) and they are not altered or enhanced after shipment. Examples of informational materials include publications, films, posters, phonograph records, photographs, microfilms, microfiche, tapes, compact disks, CD ROMs, artworks and newswire feeds.

Contact [compliance@usu.edu](mailto:compliance@usu.edu) for instruction on any potential shipments destined to Iran.

## **Travel**

Travel to Iran to attend or present at an open conference will require a license from OFAC. Similarly, a presentation via webinar to a live audience that includes individuals inside Iran would also require a license from OFAC. These licenses generally take four to six months to process, but in some instances, they may take a year or more. If you are interested in conducting any of these activities, contact [compliance@usu.edu](mailto:compliance@usu.edu) as early as possible for consultation and assistance.