

# Export Controls: Iran Sanctions Travel and Activities Guidance

This document is important for all faculty, staff and students who are interested in traveling to Iran or will be engaging with an Iranian entity to review.

## Background

The Department of Treasury, Office of Foreign Assets Control (OFAC) broadly regulates and restricts transactions with embargoed countries including certain academic collaborations and exchange of research materials and equipment. The most comprehensive controls apply to: Cuba, Iran, North Korea, Sudan and Syria. The regulations are country specific. This overview of selected prohibited transactions and exemptions focuses on OFAC regulations regarding transactions with Iran, specifically the Iranian Transactions and Sanctions Regulations (31 CFR Part 560).

## Penalties

Penalties can apply to the individual, the institution or both. Criminal penalties may result in fines of up to \$1 million per violation and up to 20 years in jail for natural persons. Civil penalties may also be imposed, in an amount up to \$250,000 or an amount equal to twice the amount that is the basis of the violation.

## Who this applies to

OFAC regulations apply to U.S. persons. The term United States persons means any United States citizen, permanent resident alien, entity organized under the laws of the United States (including foreign branches), or any person in the United States. See 31 CFR §560.314.

The regulations apply to United States citizens and permanent residents wherever located and to foreign nationals located inside the United States (and in some cases, to foreign nationals outside the U.S. See 31 CFR §560.205 and 560.420).

Action	Detail	Regulatory Reference
Prohibited importation of goods or services from Iran	Except as otherwise authorized (e.g., pursuant to a license issued by OFAC), the importation into the United States of any goods or services of Iranian origin or owned or controlled by the Government of Iran, other than information and informational materials is prohibited. An example might be: <ul style="list-style-type: none"> <li>x Accepting samples shipped from Iran for testing or analysis;</li> </ul>	See § 560.201
Prohibited exportation, reexportation, sale or supply of goods, technology, or services to Iran	“Services” is broadly construed to mean providing anything of value, even if no money is exchanged. Examples might be: <ul style="list-style-type: none"> <li>x Attending and presenting at a conference in Iran</li> <li>x Conducting a transaction with an Iranian person</li> </ul>	







	The student to whom the release is made is not enrolled in school or participating in the educational program as an agent, employee, or contractor of the Government of Iran or a business entity or other organization in Ira	
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### Don't

- x Provide to Iranian nationals that reside in Iran or to Iranian institutions technical assistance or analysis that would constitute a "service" without an OFAC license.
- x Travel to Iran and bring anything other than personal belongings (note that if personal belongings include a controlled item, the item would still require a license) or equipment covered by an OFAC license. University owned equipment or material may require a specific export license.
- x Import from Iran or Export to Iran (apart from personal items you bring for personal use during travel) anything outside of informational materials humanitarian donations without an OFAC license See § 560.315.
- x Transfer funds to Iranian financial institution or to an individual or entity on one of the government restricted party lists.

### Summary

OFAC publishes some country-specific guidance on regulatory interpretation, but such guidance is not comprehensive. The Iranian Sanctions are updated frequently through publications to the Federal Register. If you are contemplating a collaboration with or research in Iran there may be licensing requirements. Licensing for Iran may take months to obtain approval and shipments or research timelines may be impacted.