

Guidance on Iran and OFAC





Under current regulations administered by the Office of Foreign Assets Controls (OFAC) within the Department of Treasury, there are comprehensive sanctions against the country of Iran. If your activity involves collaboration with, travel to, or shipping to an Iranian entity or individual(s), contact the Office of Culture, Ethics and Compliance for guidance.

The following is an overview of some common activities and how they are impacted.



Education

- Iranian students are eligible to participate in both undergraduate and graduatelevel study and research while physically in the United States as long as appropriate visas are in place.
- USC students are authorized to participate in educational courses and engage in noncommercial academic research at Iranian universities at the undergraduate level. Participation in graduate-level courses and noncommercial academic research in the humanities, social sciences, law, or business is also permitted.
- With respect to online education, the regulations impose limitations on Iranian students participating while in Iran. Please consult with the Office of Culture, Ethics and Compliance prior to allowing participation in an online course by a student who is or will be located in Iran.



Travel

OFAC usually requires a license prior to travel to Iran to attend or present at an open conference. Similarly, a presentation via webinar to a live audience that includes individuals inside Iran would also require a license from OFAC. Because it can be a lengthy process to obtain a license, contact the Office of Culture, Ethics and Compliance at least six months prior to the intended travel.

Contact the Office of Culture, Ethics and Compliance if you have any questions.

compliance@usc.edu



Research Activities

- While there is a limited exception for sharing of informational materials in the public domain with collaborators in Iran, the exception does not extend to materials not fully created and in existence on the date the informational materials are shared.
- Engaging in research activity with an Iranian entity or individual based in Iran is usually considered to be the provision of a service to Iran, and requires specific authorization from the Department of Treasury. This includes:
 - Designing experiments
 - Reviewing preliminary data and results obtained in Iran or sending such data and results to Iran
 - Preparing manuscripts with Iranian colleagues (except for editing of manuscripts already in existence)
 - Sending or receiving research materials (e.g., samples)
 - In-person presentation of research results at conferences held in Iran (see Travel Guidance as well).
- If you intend to engage in any of the activities listed above, please contact the Office of Culture, Ethics and Compliance for assistance in preparing the necessary license application to OFAC. Because this process can be lengthy, please reach out as soon as you become aware of such a collaboration.



Shipping

Physical shipments of goods from the U.S. to Iran are prohibited by both the OFAC and Bureau of Industry and Security (BIS). Both agencies have mechanisms to apply for licenses to allow the export of items to Iran, but license applications are usually denied unless the export supports an approved activity in Iran (i.e., educational exchange).

Contact the Office of Culture, Ethics and Compliance prior to shipping any item to Iran.