**Iranian Sanctions for Researchers**

Iran is under strict U.S. sanctions, and while certain educational activities do not require specific authorization, most activities involving Iran will require a specific license from the Office of Foreign Assets Control (OFAC).

Faculty, staff, and students wishing to travel to Iran or engage with an Iranian entity (including a university in Iran) must consult[[1]](#footnote-1) with the Assistant Vice President of Research Integrity & Compliance at officeofresearch@chapman.edu prior to engaging in any of the following activities:

**ACTIVITIES THAT MAY REQUIRE A LICENSE**

* Attend or participate in a conference or workshop organized in Iran.
* Provide Iranian nationals that reside in Iran, or Iranian institutions, with:
	+ technical assistance
	+ data analysis
	+ mentoring/advising services.
* Travel to Iran to engage in activities that are not listed under General License G (see below).
* Travel to Iran with anything other than personal belongings, equipment covered by an OFAC license, or equipment allowed under Iran General License D-1 (see below).
	+ Note that a license will still be necessary if personal belongings include any controlled item.
	+ Chapman-owned equipment and material may require a specific license.
* Import from Iran or export to Iran.
* Enter into any agreement with an Iranian institution.
* Engage in research collaborations with Iranian nationals located in Iran or with Iranian institutions.

A license may be required if you are contemplating any of these activities. Depending on the activity, license applications for Iran can sometimes take several months or more to process, with no guarantee of approval.

*Note that Iranian Unmanned Aerial Vehicles and Their Use by the Russian Federation Against Ukraine (Effective Date: 2/24/2023): New export regulations address the use of Iranian Unmanned Aerial Vehicles or Systems (UAVs) by Russia in its ongoing war against Ukraine, contrary to U.S. national security and foreign policy interests. The regulatory amendments target Iran’s supply of UAVs to Russia to enhance Russia’s defense industrial base and its military efforts against Ukraine. The rule also imposes license requirements for EAR99 items (low-level items) that are destined to Iran, and it aligns with the existing Russia/Belarus rules to ensure items are similarly controlled. Federal Register 88 FR 12150* [*https://www.federalregister.gov/documents/2023/02/27/2023-03930/export-control-measures-under-the-export-administration-regulations-ear-to-address-iranian-unmanned*](https://www.federalregister.gov/documents/2023/02/27/2023-03930/export-control-measures-under-the-export-administration-regulations-ear-to-address-iranian-unmanned)

**ACTIVITIES THAT MAY NOT REQUIRE A LICENSE**

OFAC has issued authorizations and general licenses to authorize some otherwise prohibited activities. The activities described in the authorizations and general licenses are approved without needing to apply for a specific license. Please contact the Office of Research Compliance at officeofresearch@chapman.edu before utilizing one of the authorizations below, as some restrictions may apply.

* Recipients of visas are authorized to carry out those activities for which such a visa has been granted. Certain transactions related to the filing and preparation of visa applications are also authorized.
* Personal telecommunications and mail transactions are authorized as long as nothing of value is transmitted.
* Certain transactions related to intellectual property protection are authorized (e.g., filing for patent protection).
* Collaborating on the creation and enhancement of written publications is authorized, assuming the transaction does not involve the Government of Iran or an agency thereof[[2]](#footnote-2).
	+ The collaboration may involve only transactions that are necessary and ordinarily incident to the creation and publication.
	+ Does not authorize the development, production, or design of software or any controlled item or technology.
* The exchange of personal communications over the Internet, such as instant messaging, chat and email, and social networking, is authorized, provided that such services are publicly available and at no cost to the user.
* Accredited U.S. academic institutions may engage in the following activities concerning undergraduate programs in the humanities, social sciences, law, and business:
	+ Recruit, hire, and employ faculty and staff who are ordinarily resident in Iran.
	+ Recruit, enroll, and educate students who are ordinarily resident in Iran.
	+ Recruit individuals ordinarily resident in Iran, such as scholars, artists, performers, speakers, alumni, and students, to participate in events, such as conferences, lectures, film series, research workshops, exhibitions, theatrical and musical performances, and continuing education courses. U.S. undergraduate institutions are authorized to provide compensation, including honoraria, to such individuals.
* [General License G](https://ofac.treasury.gov/sanctions-programs-and-country-information/iran-sanctions):
* Authorizes U.S. academic institutions to enter into student exchange agreements with universities located in Iran.
* Authorizes certain educational services, including:
	+ Those necessary to the filing and processing of applicants and the acceptance of payments for submitted applications and tuition from or on behalf of Iranian citizens.
	+ Those related to the recruitment and employment in a teaching capacity of Iranian citizens who are already employed in a teaching capacity at an Iranian university provided the appropriate visa is granted.
	+ Participation in educational courses or engagement in non-commercial academic research at Iranian universities at the undergraduate level by U.S. persons actively enrolled in U.S. academic institutions.
	+ Participation in educational courses or engagement in non-commercial academic research at Iranian universities at the graduate level in humanities, social sciences, law, or business.
	+ The participation by Iranian citizens in undergraduate-level online courses provided by U.S. academic institutions in the fields of the humanities, social sciences, law, or business, provided that the courses are of the type ordinarily required for the completion of undergraduate degree programs in the humanities, social sciences, law or business, or are introductory undergraduate level science, technology, engineering, or math courses ordinarily required for the completion of undergraduate degree programs in the humanities, social sciences, law or business.
* [General License D-2](https://ofac.treasury.gov/sanctions-programs-and-country-information/iran-sanctions):
* Authorizes the export (including for travel purposes) to Iran of fee-based or no-cost services incident to the exchange of communications over the Internet such as instant messaging, chat, email, social networking, sharing of photos, video conferencing, web browsing, blogging, e-learning platforms, automated translation, web maps, and user authentication services, as well as cloud-based services in support of the foregoing or of any other transaction authorized or exempt under the ITSR.
* Authorizes the export to Iran of fee-based or no-cost software designated as EAR99 or 5D992.c, that is necessary to enable services incident to the exchange of communications over the Internet such as instant messaging, chat, email, social networking, sharing of photos, web browsing, blogging, social media platforms, collaboration platforms, video conferencing, e-gaming, e-learning platforms, automated translation, web maps, and user authentication services.
* The following are specifically authorized for export (including travel) to Iran, subject to some restrictions:
	+ Standard mobile phones, PDAs, SIM cards, and most mobile operating systems
	+ Standard laptops, tablets, and personal computing devices
	+ Some anti-virus software
	+ Standard VPN software

*Taking your laptop or mobile device when you travel significantly increases the possibility of data and identity theft. If you are traveling to high-risk countries or countries with technological restrictions, consider the following guidelines to help secure your data.* [*Travel data can be found here.*](https://www.chapman.edu/research/_files/1_chapman-internaltional-travel-security-guidelines-08292023.pdf)

References:

* Department of State page on Iran Sanctions: <https://www.state.gov/iran-sanctions/>
* Office of Foreign Asset Controls page on Iran: <https://ofac.treasury.gov/sanctions-programs-and-country-information/iran-sanctions>
* CFR Sanctions page: <https://www.ecfr.gov/current/title-31/subtitle-B/chapter-V/part-560>

We thank our colleagues at [Cornell University](https://researchservices.cornell.edu/policies/export-controls-iran-sanctions-guidance-document) for their help with this page.

1. The lists of prohibitions and authorizations contained in this document are not all-inclusive and subject to change. Certain additional restrictions may apply. [↑](#footnote-ref-1)
2. <https://www.ecfr.gov/current/title-31/subtitle-B/chapter-V/part-560>; the General License authorizing “transactions necessary and ordinarily incident to publishing” can be found here in § 560.538 <https://www.ecfr.gov/current/title-31/subtitle-B/chapter-V/part-560/subpart-E/section-560.538> [↑](#footnote-ref-2)