

Iran Sanctions and Travel

(Current as of September, 2017)

The Department of Treasury, Office of Foreign Assets Control (OFAC), broadly regulates and restricts transactions with embargoed countries, including academic exchanges and research collaborations. Currently, some of the most comprehensive controls apply to Cuba, Iran, North Korea, and Syria. This document provides general guidance to the Penn community for Iran travel.

Who this applies to

OFAC regulations apply to U.S. persons, which is defined as any U.S. citizen, permanent resident alien, entity organized under the laws of the United States, or any person in the United States.

The regulations apply to U.S. citizens and permanent residents wherever located, and to foreign nationals located inside the United States. Individuals with dual U.S. citizenship are considered “U.S. persons.”

Anyone traveling on behalf of Penn, regardless of nationality or passport used, is subject to the OFAC regulations and may require a license from the U.S. government before engaging in certain activities in Iran or with Iranians.

BEFORE YOU GO

If you are planning to travel to Iran or engage in a collaboration with an Iranian institution, please contact the Export Compliance Office (expctrl@lists.upenn.edu, or 215-573-8817) before you:

- Travel to Iran to attend or participate in a conference or workshop
- 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 if personal belongings include any controlled item, a license will still be necessary
 - Penn-owned equipment and material may require a specific license
- Provide Iranian nationals that reside in Iran, or Iranian institutions, technical assistance or analysis
- Import from Iran or export to Iran
- Enter into any type of agreement with an Iranian institution

If you are contemplating any of these activities, a license may be required. Depending on the activity, license applications for Iran can sometimes take several months to process, so please contact the Export Compliance Office well in advance of your expected travel dates.

General Authorizations Relevant to Penn-related Travel to Iran

1. **General License G:** Iran General License G authorizes accredited U.S. academic institutions (such as Penn) to establish and operate undergraduate and graduate academic exchange agreements with Iranian universities, including providing scholarships to participating Iranian students.

Educational activities that fall under General License G:

- Student participation in educational courses or noncommercial academic research at Iranian universities at the undergraduate level;
- Student participation in educational courses at the graduate level or noncommercial academic research at Iranian universities in the humanities, social sciences, law, or business at levels above the undergraduate level;
- Participation by individuals in Iran or ordinarily resident in Iran in online undergraduate courses (including MOOCs) in the humanities, social sciences, law, or business, or introductory level science and engineering courses ordinarily required for the completion of undergraduate degree programs;
- Providing services to Iran in support of combating illiteracy, increasing access to education, and assisting in educational reform projects;
- Administering professional certificate examinations and university entrance exams and providing services necessary or required for admission to U.S. academic institutions to individuals in Iran or residents of Iran;
- Certain publishing-related activities

All other academic exchanges in Iran, including attending or presenting at academic conferences and workshops, require a specific license from OFAC.

2. **General License D-1** generally authorizes the export to Iran, and re-importation into the U.S., of certain hardware incident to personal communications including laptop computers and peripherals for such devices (including but not limited to consumer disk drives and other data storage devices) designated as EAR99 or classified on the Commerce Control List under Export Control Classification Numbers (ECCNs) 5A992.c (includes most smartphones and tablets), 5A991.b.2, or 4A994.b. (Special rules may apply if you have certain encryption technologies installed on your device.) Please contact the Export Compliance Office if you are unsure whether your devices meet these criteria. (As a reminder, when you travel to Iran with a tangible item, you are “exporting” the item to Iran, even if you intend to bring it back with you to the U.S.)

For questions related to OFAC sanctions, licensing, or export control regulations in general, please contact expctrl@lists.upenn.edu or 215-573-8817.