

## Sanctions Implications for Online Courses

The provision of online courses to an individual physically located within a country subject to comprehensive sanctions administered by the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) is considered the export of a regulated service. Authorization for the provision of the service must be granted via either a general or specific license. In addition to the provision of services for offering the course, the export of items other than general software utilized to host the course would require review. The export of commodities and items related to the course would require a specific license to each individual unless a general license or exception is available.

Below is a detailed review of the related citations for each country.

Country	Citation	Course Level/Description	Allowable/Unallowable	Notes
<b>Cuba</b>				
Cuba	31 CFR 515.565 (a)(2)(x)	Undergraduate or below online Internet-based courses	Allowable via general license	
Cuba	31 CFR 515.201(a)	Graduate internet-based courses	Unallowable	Unless specifically authorized by OFAC through license
<b>North Korea</b>				
North Korea	31 CFR 510.201 (a)(3)(ii)(B)	All online, internet-based course	Unallowable	Unless specifically authorized by OFAC through license
<b>Syria</b>				
Syria	31 CFR 542.207	Graduate and Undergraduate online internet-based courses	Unallowable	Unless specifically authorized by OFAC through license
<b>Crimea Region</b>				
Crimea Region of the Ukraine	Pursuant to E.O. 13685, dated 12/19/2014	Online Internet-based courses graduate and undergraduate	Unallowable	Unless specifically authorized by OFAC through license

Country	Citation	Course Level/Description	Allowable/Unallowable	Notes
<b>Iran</b>				
Iran	31 C.F.R. 560. General License G, (b)(1)(iii)	Online courses (including Massive Open Online Courses, coursework not part of a degree seeking program, and fee-based courses) in the humanities, social sciences, law, or business provided that the courses are the equivalent of courses ordinarily required for the completion of undergraduate degree programs in the humanities, social sciences, law, or business	Allowable via general license	Does not cover individuals in degree seeking programs in science or engineering.
Iran	31 C.F.R. 560. General License G, (b)(1)(iii)	Introductory undergraduate level science, technology, engineering, or math <i>courses ordinarily required for the completion of undergraduate degree programs in the humanities, social sciences, law or business.</i>	Allowable via general license	Does not cover individuals in degree seeking programs in science or engineering.
Iran	31 C.F.R. 560. General License G, (b)(1)(iii)	Introductory undergraduate level <i>courses ordinarily required for the completion of undergraduate degree programs in engineering, science, or math.</i>	Unallowable	Unless specifically authorized by OFAC through license
Iran	31 CFR 560.204, 31 CFR 560.410(a)	Online Internet-based Graduate level courses	Unallowable	Unless specifically authorized by OFAC through license