

Sanctions Implications for Online Courses

The provision of online course(s) 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) constitutes an export of a regulated service. Authorization for the provision of the regulated service must be granted via either by 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 any commodities and items related to the course should be reviewed to determine any applicable licensing requirements.

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

Country	Citation	Course Level/Description	Allowable/Unallowable	Notes
Cuba				
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
Cuba	31 CFR 515.565 Note 2 to paragraph (a). 15 CFR 740.21	Online Course Software	Requires EAR licensing determination	Allowable for ECCNs: EAR99 and 5D992.c
North Korea				
North Korea	31 CFR 510.201 (a)(3)(ii)(B)	All online, internet-based course	Unallowable	Unless specifically authorized by OFAC through license
Syria				
Syria	31 CFR 542.207	Graduate and Undergraduate online internet-based courses	Unallowable	Unless specifically authorized by OFAC through license
Crimea Region				

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
Iran				
Iran	31 C.F.R. 560. General License G, (b)(1)(iii)	Online internet-based 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)	Online internet-based introductory undergraduate level courses in 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)	Online internet-based 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
Iran	31 C.F.R. 560. General License G, (c)(1)	Online course software	Allowable via general license	Must be EAR99 or Educational Information not subject to the EAR. (See 15 CFR 734.9).
Iran	31 C.F.R. 560. General License M(a)(1)	Online internet-based graduate courses in <i>humanities, social sciences, law, or business</i> or <i>introductory science, technology, engineering, or mathematics courses ordinarily required for the completion of graduate degree programs in the humanities, social sciences, law, or business</i>	Allowable via general license during COVID-19 pandemic.	General License authorization expires on September 1, 2021