

# Red Flags for Sanctioned Countries

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# Sanctioned Countries, what are those?

## Comprehensively Sanctioned Country:

Cuba, Iran, North Korea, Syria, Crimea Region of Ukraine

## Other embargoed Country:

Examples: Iraq, Sudan, China, Russia, Venezuela

# Sanctioned and Embargoed Countries

## Impact on Activities... (NORMALLY)

- Each country has different sanctions and exceptions. For instance, Iran sanctions prohibit any export or import of any “good or service” to or from Iran. The Government has said that merely attending a conference in Iran is the “export” of a “service” that requires a license.
- Identify export licensing requirement up front to avoid delays and complications – licensing can take 7 weeks to a year to obtain, if granted at all.
- May impact participation by foreign nationals, faculty, staff and visitors.



# Sanctioned and Embargoed Countries Impact on Activities... (during a pandemic)

- A students in a comprehensively sanctioned country can't take classes without a license.
- Teaching (even by a U.S. person) in a comprehensively sanctioned country to U.S. students requires a license.
- Research from a comprehensively sanctioned country requires a license.
- NOTE: Embargoes countries will have different requirements, these activities still could require a license.
- License wait time might be increased and no guarantee will get one.

# What about the Fundamental Research Exemption/Exclusion “FRE”?

Exemption from export controls applies to “technology” and “software” resulting from fundamental research:

- When conducting fundamental research
- **At a university in the U.S.**
- With the intent to publish the results
- And you have accepted no publication/dissemination restrictions (other than a reasonable review period to identify and redact proprietary information, or to protect intellectual property prior to publication).

# Activities that could be export controlled...

- Exporting Technology Abroad
- Physical shipments of tangible items outside the U.S.
- Hand-carrying items during international travel
- Emailing technical data to recipients in foreign countries
- Allowing foreign entities access to download technical data or software



What to do if you are concerned?

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