**Embargoed/Sanction 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.

NOTE- Even with a license or documented general license third party vendors may still use geo-fencing to block access in sanctioned countries.

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| **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 or falls within general license 22 5/12/2022 |
| **Ukraine Crimea, Donetsk and Luhansk Region** | | | | |
| Crimea, Donetsk Peoples Republic (DNR) and the Luhansk People’s Republic (LNR) Region(s) of the Ukraine | Pursuant to E.O. 13685, dated 12/19/2014 and E.O. 13685 2/21/2022 | Online Internet-based courses graduate and undergraduate | Unallowable | Unless specifically authorized by OFAC through license |
| **Country** | **Citation** | **Course Level/Description** | **Allowable/Unallowable** | **Notes** |
| **Iran** | | | | |
| 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 *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 *courses ordinarily required for the completion of undergraduate degree programs in engineering, science, or math.* | 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 | Must be EAR99 or Educational Information not subject to the EAR. (See 15 CFR 734.9). |
| North Korea | 31 C.F.R. 510 | No online courses permitted. Providing services from the U.S. or by a U.S. person is prohibited. May be able to explore a license. | Unallowable | Unless specifically authorized by OFAC through license |
| **No comprehensive embargos for the countries below. Provided for general awareness** | | | | |
| Russia and Belarus |  | No comprehensive embargo but broad restrictions  Payment challenges, particularly with Russian financial institutions |  |  |
| China |  | Prohibitions on VPN & PP10043 (potential impacts to online learning if previously denied visa?) | It may be hard to identify applicants that have had a visa denied and that are applying for an online degree |  |
| Venezuela |  | No comprehensive embargo  Sanctions on Government of Venezuela, including related agents and entities  Tuition payments -make sure no sanctioned banks are involved, unless authorized |  |  |