

COMPLIANCE ALERT

SEPTEMBER 1, 2020

FEDERAL LAWS MAY REGULATE WHETHER YOU CAN PROVIDE ONLINE CLASSES TO STUDENTS LOCATED OUTSIDE THE UNITED STATES.

CURRENT REQUIREMENTS

Under federal export control law, online courses to an individual in a country subject to comprehensive sanctions, including Cuba, Iran, North Korea, Syria, and the Crimea region of Ukraine, **is an export of regulated services** that may require a license.¹

For example, because of COVID-19, some UC students have been unable to travel to the United States to begin classes. These students may wish to continue their study through online classes. If the student is residing in Cuba, Iran, North Korea, Syria, or the Crimea region of Ukraine, the University most likely will need to obtain a license before online courses can begin. License determinations are made by the location's Export Control Officer, who will review the proposed activity and apply for a specific license when one is needed.

LICENSE TIMING

License applications take 3-12 months or longer for processing by the federal government, and approval is not guaranteed. The license must be in place before the provision of the service or in the above example, before the individual takes courses.

CAMPUS COORDINATION

To identify students who may potentially participate in online courses from a sanctioned country, the following offices should coordinate with their local export control office and, if needed, with University counsel:

- International Students and Scholars Directors
- Office of the Registrar
- Graduate and Undergraduate Division Deans
- Extension

If you have additional questions contact your [local Export Control Officer](#) or contact Marci Copeland, Associate Director Systemwide Export Control at marci.copeland@ucop.edu.

KEY TAKEAWAY

The location Export Control Officer should be consulted in advance of any plans to deliver online education to individuals in the sanctioned countries listed above for a license determination. The University is required to obtain a license in advance of providing courses, when one is required.

OTHER RELATED ACTIVITIES

See Compliance Alert, dated September 2, 2020, for details on similar activities that may fall under sanctions regulations.

¹ RELEVANT REGULATIONS:

Cuba: [31 CFR 515.201\(a\)](#), [31 CFR 515.565 \(a\)\(2\)\(x\)](#)

Iran: [31 CFR 560.204](#), [31 CFR 560.410\(a\)](#), [31 CFR 560. General License G](#)

North Korea: [31 CFR 510.206](#)

Syria: [31 CFR 542.207](#)

Crimea Region of the Ukraine: [E.O. 13685](#), dated 12/19/2014