

## COMPLIANCE ALERT

SEPTEMBER 2, 2020

## FEDERAL LAWS MAY REGULATE RESEARCH/TELEWORK FROM CERTAIN COUNTRIES

## CURRENT REQUIREMENTS

Under federal export control law, University research or telework from a country subject to comprehensive sanctions, including Cuba, Iran, North Korea, Syria, and the Crimea region of Ukraine, **is a regulated service and may require a license**<sup>1</sup>.

For example, the COVID-19 pandemic travel restrictions are preventing some UC researchers from entering the United States to begin work. In some situations, the researchers desire to work remotely. If a researcher is in Cuba, Iran, North Korea, Syria, or the Crimea region of Ukraine, the University will most likely need to obtain a license before work begins. 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 regulated service or, in the above example, before the individual begins work remotely.

## CAMPUS COORDINATION

To identify UC employees who may potentially conduct research or telework from a sanctioned country, the following offices and individuals should coordinate with their local export control office, and if needed, with University counsel:

- Academic Personnel
- Graduate and Undergraduate Division Deans
- Faculty

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](mailto:marci.copeland@ucop.edu).

## KEY TAKEAWAY

*The location Export Control Officer should be consulted in advance of any plans for research/telework from the sanctioned countries listed above for a license determination. The University is required to obtain a license in advance of research or telework, when one is required.*

## OTHER RELATED ACTIVITIES

See Compliance Alert dated September 1, 2020 for details on similar activities that may fall under sanctions regulations.

<sup>1</sup> RELEVANT REGULATIONS

Cuba: [31 CFR 515.201\(a\)](#), [31 CFR 515.564](#), [31 CFR 515.565](#)

Iran: [31 CFR 560.201](#), [31 CFR 560.204](#), [31 CFR 560.410\(a\)](#), [31 CFR 560. General License G](#)

North Korea: [31 CFR 510.205](#), [31 CFR 510.206](#)

Syria: [31 CFR 542.207](#)

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