

What is OFAC?

The U.S. Department of Treasury, Office of Foreign Asset Controls (OFAC) administers U.S. sanctions against Iran, Cuba, North Korea, and various other countries. There are serious penalties for violations. The University has a strong commitment to its academic mission, which must be balanced with the obligation to comply with U.S. law.

2. What types of sanctions exist?

Comprehensive Sanctions Generally prohibits all direct or indirect imports/exports, trade brokering, financing, or facilitating against most goods, technology, and services. Transactions will require a specific license or an approved exception before

Regime or List Based Sanctions Blocks governments, regimes, supporters, and persons but which may be owned, controlled by, or entities as a front organization.





A general license authorizes a particular type of transaction for a class of persons without the need to apply for a license.

A specific license is a written document issued by OFAC to a particular person or entity, authorizing a particular transaction in response to a written license application.

Persons engaging in transactions pursuant to general or specific licenses must make sure that all conditions of the licenses are strictly observed.

The USF Office of Export Controls is available to apply for specific licenses on behalf of USF when necessary.

8. What are examples of prohibited services?

Advising a student on a dissertation or thesis when the student is located in a comprehensively sanctioned country.

Providing educational services in the form of distance learning, class instruction, grading, and return of coursework or exams, research advising, or exchange of unpublished course information. This would include examples including activities such as: allowing an individual located in Iran access to group research meetings via Skype; or allowing a student to submit course assignments for grading from Iran.

Provision of business services such as USF email, CANVAS, Remote Desktop Gateway (RDG) or other internet-based services requiring a USF NETID to access.

Provision of educational services related to research, such as accepting data or samples from a comprehensively sanctioned country, providing analysis of those samples and returning the data set.

Importing research samples or datasets from a comprehensively sanctioned country, even if there is not a monetary value to the samples. For example, if a professor travels to Cuba under the auspices of a general license to conduct research in Cuba, the professor would not be allowed to collect and import research samples back to the United States without a specific license from OFAC.

Provision of financial services to an individual in a sanctioned country or in a third country without a valid visa. This would include payment for services such as teaching or research, even if the payment went to a US bank account.

9. Correspondence via telecommunication or mail



A student has applied from a sanctioned country and would like to offer them a position at USF as my graduate research student. Can I communicate this to them through a letter? Yes. It is legal to correspond with individuals in sanctioned countries to exchange public information or information related to a planned student visa.

Can I send a student in a sanctioned country the syllabus to my course, if they are planning to attend the course on campus in the United States? You can send them a link to a website that does not require login where the syllabus is posted. However, you are prohibited from providing educational guidance or requiring the student submit assignments prior to their arrival in the United States.

10. Iranian Sanctions – what do I need to know?

For guidance on what is allowable involving Iranian sanctions, please visit our [Guide to Iranian Sanctions](#) Document. This document explains what is allowable when traveling to Iran or working with an individual from Iran.

11. Travel to Cuba – what do I need to know?

For guidance on how to legally travel to Cuba under the auspices of USF business, please visit our [Cuba Updates](#) page. Specific assistance is also available from USF Office of Export Controls by emailing exportcontrol@usf.edu or calling 813-974-



4. If I am an applicant or current on-campus student, how can I register for classes while I am located in a sanctioned country?

Enrolling in an on-line course and attending the course while physically located in Cuba, Iran or Syria is not allowable. If you are attempting to register prior to coming to the U.S. for on-campus courses, please contact the Office of the Registrar by calling 1-813-974-2000 or through their on-line contact page, found at:

http://www.registrar.usf.edu/office_contact_create.php?contact=12.

5. I am a potential student who currently resides in a sanctioned country. How can I find out if I have been accepted to attend USF's on-campus program?

Please contact the Office of Graduate Studies by calling 1-813-974-5762 or by emailing gradliaison@grad.usf.edu.