

Countries of Concern

Department of State & Department of Commerce

The United States supports and maintains country and entity specific sanctions and embargoes to further foreign policy, national security interests, and United Nations Security Council embargoes. Each US regulatory agency, Dept. of Commerce, State, and Treasury, has their own list of sanctioned or embargoed countries. The lists are continually updated and it's best to review the websites for the updated information. The sanctions and embargoes control specific activities and items to certain destinations.

[US Dept of Commerce Country Groups](#)

The activities conducted by university faculty, staff, and students either within the US or abroad may be controlled by the regulations. Any export (e.g. physical and intangible shipment, hand-carry, travel, etc.) to an embargoed or sanctioned country or entity is strictly regulated and enforced. In addition, hosting a foreign person as a visitor, researcher, scholar, and employee from a restricted entity or country requires an extensive review for compliance.

The Department of State and Commerce have both their country specific guidance outlined in their respective regulations and websites, which is located:

- [US Dept of State countries](#) and are listed in [22 CFR 126.1](#)
- BIS maintains two categories of controls for items and activities to implement US government policies: comprehensive controls and sanctions based on categories of items specific destinations ([EAR part 746](#))

Sanctioned Destinations

- Crimea
- Cuba
- Iran
- North Korea
- Sudan
- Syria

Department of Treasury

The Department of Treasury through the Office of Foreign Asset Controls (OFAC) lists country specific programs, some of which, limit many transactions that would be considered a transfer of value. Besides the country specific programs, OFAC also continually updates their Specially Designated Nationals and Blocked Persons List (SDN). The SDN consists of individuals and entities (e.g. groups, companies, etc.) that are owned or acting on the behalf of targeted countries, terrorists, and narcotics traffickers that do not fall under country specific programs. The SDN lists blocks their assets and generally prohibits US persons from working with them.

There are many US lists to consider for compliance with the regulations, please visit the [Restricted Party Screening webpage](#) for further guidance.

Peer Review/Editor for Publication from a Sanctioned Country

Reviewing and editing a publication with someone from a Sanctioned country (e.g. Iran, Cuba, etc.). The below link has guidance from OFAC:

<http://www.treasury.gov/resource-center/sanctions/Documents/ia040504.pdf>

If you will need to conduct activities that would constitute a service then let me know and we will file a license application with OFAC. Below excerpt from page 3 explains a service that would require a license:

“For purposes of clarifying the application of that regulatory standard in this context, we would consider a prohibited exportation of services to occur when a collaborative interaction takes place between an author in a Sanctioned Country and one or more U.S. scholars resulting in co-authorship or the equivalent thereof.”

If you are concerned that your activity would be considered a “service”, please contact the Export Controls Office.

Other sources for international embargo information:

- Army Technology
- Stockholm International Peace Research Institute
- European Union - Restrictive Measures (Sanctions) in Force

Other sources:

- Information on shipping
- Information on international travel

If you have questions pertaining to a specific country or activity, please contact the [Export Controls Office](#).