

MEMORANDUM

To: UA Campus Colleagues

From: Andrew C. Comrie, Ph.D. 
Senior Vice President for Academic Affairs and Provost

Date: September 9, 2015

Subject: OFAC Sanctions and University Travel to Iran

Iran has been in the news recently, which along with an uptick in University of Arizona (UA) travel requests to visit Iran has prompted distribution of this reminder out to Campus. The U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) Iranian sanctions remain in place. Violations of Federal export control regulations can result in fines, loss of current and future federal funding, and other civil or criminal penalties.

In most cases, travelers on official UA business will need prior U.S. government approval in the form of a license in order to conduct activities in Iran. Providing a service (something of value), or importing information or other goods requires an OFAC license. Such activities include, but are not limited to, attending or speaking at a conference, performing research, or teaching in Iran.

In addition, the U.S. Department of State and the governments of many other countries advise against travel to Iran ([Travel Warning](#)). [Travel to sanctioned countries and most countries with travel warnings](#) requires review by the UA's International Travel Safety Oversight Committee (ITSOC) and approval by Department Heads and Deans, with the final approval of the Provost.

It is currently taking a minimum of nine months for OFAC to process license applications. In order to navigate federal licensing requirements coupled with safety and security concerns, UA activities in Iran and/or travel to Iran must be considered well in advance.

To enable the UA offices involved to help employees effectively with Iran travel preparation, individuals must please allow **nine months to one year prior to the anticipated travel or activity date** to review and process the request, starting immediately. No UA travel to Iran will be approved without first being reviewed by the University Export Control Program (UECP) followed by the receipt of any necessary approvals (licenses). Requests may involve the coordination of many units, including:

- [University Export Control Program](#) (UECP) – Export control review; applies for all export licenses
- Department Head and Dean
- International Risk Analyst
- International Travel Safety Oversight Committee (ITSOC)
- Provost
- [UA Institutional Review Board \(IRB\)](#), if applicable

STEPS TRAVELER WILL NEED TO TAKE

- Register in the online UA International Travel Registry
- Contact UECP (export@email.arizona.edu) immediately for an export licensing determination
- Examples of information UECP may ask traveler to provide for export control analysis and OFAC license application include:
 - If applicable, conference invitation and website or other background information about the conference
 - An example of the presentation content (slides) or publication about the topic
 - Description of research proposal
 - Names of key Iranian individuals and institutions traveler will be visiting
 - Information about equipment, data or other information traveler would like to take - other government agency approvals may be required
- Traveler will need to work with the International Risk Analyst to:
 - Create strategies to mitigate institutional and traveler vulnerabilities and risks
 - Develop communication and emergency plans
 - Petition for travel approval from the Department Head, Dean, ITSOC, and Provost

If you have questions or need additional information about the travel approval process, please contact Laura Provencher, International Risk Analyst, at lprovenc@email.arizona.edu.

If you have questions about what is required to apply for an OFAC or other export licenses, please contact Kay Ellis, Director, University Export Control Program at export@email.arizona.edu.