

Sanctions Implications for Online Courses

There are OFAC restrictions related to taking online courses **abroad**. Licenses to provide a service to sanctioned countries are required under some circumstances. In addition, there may be licensing requirements for software and other items.

Country	Online Internet-based Course Level/Description	Allowable/ Unallowable
Cuba	Undergraduate or below	Allowable under General License
	Graduate	Unallowable without OFAC License
	Online Course Software	EAR licensing determination required
North Korea	All Levels	Unallowable without OFAC License
Syria	Graduate and Undergraduate	Unallowable without OFAC License
Crimea Region of the Ukraine	Graduate and Undergraduate	Unallowable without OFAC License
Iran	Fee-based, Non degree-seeking Undergraduate Level Humanities, Social Sciences, Law, or business classes	Allowable via General License
	Introductory Undergraduate Level Science, Technology, Engineering, or Math classes <i>Not intended for degree-seeking programs in science or engineering ordinarily required for the completion of undergraduate degree programs in the humanities, social sciences, law or business.</i>	Allowable via General License
	Introductory Undergraduate Level <i>Required for the completion of undergraduate degree programs in engineering, science, or math.</i>	Unallowable without OFAC License
	Graduate Level	Unallowable without OFAC License
	Online Course Software	Allowable, provided EAR99 or Educational Information not subject to the EAR
Foreign Students within U.S.	Those on non-immigrant visas may “carry out in the United States those activities for which such a visa has been granted.”	