



August 7, 2020

Andrea M. Gacki
Director, Office of Foreign Assets Control
U.S. Department of Treasury
1500 Pennsylvania Ave., NW
Washington, DC 20220

Dear Ms. Gacki,

We write with concern regarding the impact of sanctions on Iranian students enrolled in American universities who will not be able to enter the United States for both online and in-person coursework. With the new school year quickly approaching for most universities, this is a matter of significant urgency, and we hope that the Treasury Department's Office of Foreign Assets Control (OFAC) will consider issuing a new general license to permit Iranian nationals to access online coursework and other academic services remotely in Iran without interference.

According to a [July order issued by the Department of Homeland Security's Immigration and Customs Enforcement \(ICE\)](#), newly enrolled international students will not be able to enter the United States if their courses are online only. Additionally, a variety of health considerations, travel difficulties and immigration bans may prevent currently-enrolled students who either returned home to Iran or are presently conducting research on the ground in Iran from continuing their studies absent new action from OFAC to update its sanctions licensing in line with the new reality created by COVID-19.

A variety of sanctions appear likely to inhibit Iranian nationals in Iran from accessing online coursework from American universities, including those preventing American companies from providing services to Iranian nationals and sanctions that have encouraged major tech companies to halt the provision of services to individuals on the ground in Iran.

As we have noted in prior communication with the Treasury Department - including in our rule change request dated November 20, 2019 - Apple, Amazon, Google and many other tech companies have begun blocking Iranians from accessing key software and services as a result of limitations and ambiguities in General License D-1 and escalating U.S. sanctions on Iran. Similarly, while General License G licenses U.S. academic institutions to make certain online coursework available to students on the ground in Iran, those exceptions appear limited to



undergraduate courses related to a degree in the humanities, social sciences, law and business. Many Iranian students would fall outside those narrow exceptions.

Given the significant ambiguities involved in U.S. sanctions law, the tight time horizon and confusion across many universities as to how to approach Iranian students who may not be allowed to enter the United States, we fear that sanctions will block many individuals from beginning or continuing their academic coursework in line with U.S. interests. Already, we have heard reports that universities are planning to drop or defer Iranian students from their work until the university receives specific authorization from OFAC.

We also believe that revised guidance from ICE exempting individuals in sanctioned countries from its recent order could alleviate some of the burden likely to befall Iranian students and others.

We urge you to immediately revisit your sanctions policies and issue guidance shortly to license all activities necessary for individuals resident in Iran to access online coursework, and clearly communicate those policies to academic institutions across the United States.

Sincerely,

A handwritten signature in black ink that reads "Jamal Abdi". The signature is written in a cursive style with a large, looped initial "J".

Jamal Abdi
President