

Northwestern

Standard Operating Procedures: OFAC Compliance and Remote Online Courses

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Rationale

Individuals from certain sanctioned countries need an export control license to take courses from outside the United States. This Standard Operating Procedures (SOP) outlines the university's process for identifying students who may need a license or government authorization.

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.

OFAC Registration Hold

- OISS will place an OFAC registration hold upon issuance of the immigration document (I-20 or DS-2019) for any student from an OFAC country once a month.
- The student will be notified via email from OISS of the OFAC registration hold.
- Upon arrival to the U.S. and approved completion of the OISS immigration check-in, the OFAC registration hold will be removed by OISS so that the student may proceed with registration.

Roles and Responsibilities

OISS: OISS will place and lift the holds on student accounts. OISS will take the lead in messaging both undergraduate and graduate students. OISS will report potential OFAC issues to the Export Controls & International Compliance (ECIC) and TGS (for graduate students).

TGS: The Graduate School (TGS) will lead communications with Directors of Graduate Studies and advisors. TGS will report any potential OFAC issues to the ECIC and OISS.

ECIC: The Export Controls & International Compliance (ECIC) determine if a license is required. When applicable, apply for licenses, coordinate the control plan for meeting the license terms, and conduct an annual license audit. The ECIC will communicate any potential OFAC issues with OISS and TGS (for graduate students)

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 Ukraine	Graduate and Undergraduate	Unallowable without OFAC License
Iran	Fee-based, Non-Degree Seeking Undergraduate Level Humanities, Social Sciences, Law, or business	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
	Graduate level NON-STEM majors	Allowable under General License M which expires September 1, 2023.
	Introductory Undergraduate Level Required for the completion of undergraduate degree programs in engineering, science, or math.	Unallowable without OFAC License
	Graduate Level Required for the completion of undergraduate degree programs in engineering, science, or math.	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.”	

[AUECO](#) Chart adapted by Northwestern University

Outreach to Continuing Students & Program Directors/Coordinators

- At the beginning of each term, **OISS** send [emails](#) to international students from the affected countries to remind them of OFAC restrictions on remote educational activities (e.g., online courses outside the United States, conferences in a sanctioned country, research activities, etc.).
- **The Graduate School** additionally sends an [email](#) to Directors of Graduate Studies and Graduate Program Administrator to make them aware of the potential impact on students.
- Affected students outside the U.S. work with **Export Control & International Compliance** to secure licenses or make other arrangements within their department for a leave of absence or change of major (for undergraduates) as appropriate.

Communications

Email to all Enrolled Students from Affected Countries?

Hello and Welcome to the 2022 - 2023 Academic Year,

Northwestern highly values international students, and is also committed to following U.S. federal regulations, including the Office of Foreign Assets Control (OFAC). These regulations may impact your ability to participate in educational and research activities, including coursework, **from outside** the United States or its territories.

If you are within the United States or its territories, you do not need to take any action on this email.

However, if you are planning on participating in coursework, research or other educational activities while outside the United States or its territories, you must contact [Export Control](#). The Export Control team will determine if you need an OFAC license and ask you for the required information to apply for a license on your behalf. Keep in mind licenses take several months to be adjudicated by the federal government.

If you have any questions regarding this federal regulation, you may contact our colleagues in [Export Control](#).

Wishing you a successful academic year!

Office of International Student and Scholar Services

Email from the Provost Office (coordinate with Mike Hines)

Dear Directors of Graduate Studies and Graduate Program Administrators,

Northwestern highly values international students and collaborations. However, federal regulations require individuals from Cuba, Iran, Syria, North Korea, and certain regions of Ukraine to obtain approval from the U.S. government (i.e., a license) in order to participate in educational or research activities, including coursework, **from outside the United States.** ([Reference Guide](#)).

International students with citizenship from these countries will have an OFAC Registration Hold placed on their account until either the Office of International Student and Scholar Services (OISS) can verify they are in the United States or have a valid [Office Foreign Assets Control \(OFAC\)](#) license. Once the student either demonstrates presence in the USA or obtains an OFAC license, the hold will be removed. The email will be sent to all students from the five countries listed who have accepted their admission except for students who are listed as permanent legal residents, asylees, or refugees. The email may generate questions, which is why I wanted to reach out to you first with this informational email.

Potentially impacted students are being advised to contact the University's [Export Control](#) team for assistance in seeking a license well in advance of any anticipated **remote** educational activities (e.g., online courses outside the United States, conferences in a sanctioned country, research activities, etc.). Licenses from the OFAC take several months to be reviewed and adjudicated by the federal government. Depending on the program, students may also have the option of working with their specific program to determine whether they are eligible to be deferred to a future admit term when they can be present in the United States.

Students from sanctioned countries do **not** need an OFAC license to attend or participate in online courses from **within the United States or its territories.**

If you have any questions, reach out to amy.weber@northwestern.edu .

Thank you for your understanding,