## Update Regarding Iran Sanctions and Research Collaborations with Iran

Recent press coverage regarding the Iran nuclear deal has led some to believe, mistakenly, that the sanctions most relevant to University activities have been lifted. It is important to note that, despite recent announcements related to sanctions relief, most of the U.S. sanctions on Iran remain in place for U.S. Persons and entities (including Harvard and US citizens and green-card holders), and any activities with Iran require continued diligence. For specific questions regarding collaborations with individuals in Iran or those ordinarily resident there, shipments to Iran, or travel to Iran, please contact your <a href="School's Export Control Officer">School's Export Control Officer</a>. For specific questions regarding travel to Iran, you may also contact <a href="Global Support Services">Global Support Services</a>.

Although the recent nuclear deal did not afford much relief, the U.S. government previously issued two general licenses that permit a number of academic and research-related transactions. They are described below. If your activities fall within the parameters of these general licenses, you do not need special permission from the U.S. government to conduct your activities.

- 1. General License G: Certain Academic Exchanges and the Exportation or Importation of Certain Educational Services Authorized. Harvard faculty and researchers may:\*
  - Participate in educational courses at Iranian universities.
  - Engage in noncommercial academic research at Iranian universities.
  - Provide not-for-profit educational services in the areas of combating illiteracy, increasing access to education, and assisting in educational reform projects in Iran.
  - Permit students from Iran to register for and participate\*\* in online courses (including Massive Open Online Courses) that are equivalent to **undergraduate level** courses.
  - Receive payments in cash or from non-Iranian banks for authorized activities.
- 2. General License D-1: General License with Respect to Certain Services, Software, and Hardware Incident to Personal Communications. Despite rather strict controls on taking certain equipment or technology with you to Iran, Harvard faculty and researchers may take the following items,\* subject to some restrictions:\*\*
  - Cell phones, laptops, tablets and personal computing devices, disk drives, and data storage devices, but be sure
    to reference Harvard Global Support Services' <u>International Data Security Guidance</u> for tips on how to protect
    your IP and data when taking such items abroad.
  - Some anti-virus and anti-malware software.
  - Mobile operating systems, including apps designed to run on mobile operating systems.
  - Virtual Private Network (VPN) software, proxy tools, and fee-based client personal communications tools including voice, text, video, voice-over-IP telephony, video chat, and successor technologies.
  - Provisioning and verification software for Secure Sockets Layers (SSL).
- \* As some restrictions may apply, you should contact your <u>School's Export Control Officer</u> to confirm that the collaboration you are planning or the device or software you are proposing to take with you to Iran is permissible under **General License G** or **General License D-1**.
- \*\* The provision of services or any of the software or hardware referenced above to any individual or entity on a sanctions list remains a violation of export regulations. Thus, it is important to contact your <a href="School's Export Control Officer">School's Export Control Officer</a> to ensure that your collaborator is not on such a list.