19. Office of Foreign Assets Control (OFAC) Regulations

This Section addresses the process for complying with OFAC’s embargoed country program affecting transactions with Cuba, Iran, Syria, and Sudan.

CUNY researchers who are planning to travel to or engage in any transactions or collaborations with any of these countries must inform their respective College’s Export Control Administrator well in advance. The Export Control Administrator, in consultation with the OVCR, will determine whether any OFAC requirements apply. OFAC regulations vary on a country-by-country basis, depending on the type of activity involved. For the import/export of certain items and services provided to beneficiaries in Iran, Cuba, Syria and Sudan, particular license rules apply. Note that collaborative research arrangements that contemplate the transfer or receipt of tangible materials, the establishment of research facilities at institutions in these countries, field work being conducted in these countries, and the payment of any kind for service performed (even in support of fundamental research activity) can trigger these restrictions and require prior authorization. When required, the OVCR will apply for the appropriate license/authorization.

BIS controls a number of items for “AT” (Anti-Terrorism) purposes, controls which apply in parallel with the OFAC regulations but are distinct controls. AT-controlled items on the CCL are specifically referenced for certain countries in relation to the Country Chart. Likewise, ITAR independently controls any export to Section 126.1 prohibited countries, which includes but does not directly correspond to the list of OFAC designated countries.

The research compliance staff in the OVCR will perform a denied parties screening using the Visual Compliance software. The screening will include the Specially Designated Nationals List (SDNL), comprised of individuals/entities that OFAC specifically restricts and associates with a licensing requirement.

For OFAC-related concerns and questions, please contact OVCR.