



EXPORT CONTROLS PROCEDURES

Title: SIUC – PREVENTING PROHIBITED COURSEWORK AND RESEARCH ACTIVITIES FROM CERTAIN SANCTIONED COUNTRIES		
Procedure #: EC009	Effective Date: 04/14/2025	Author: Brenda Martin
<p>Purpose/Definitions: SIU highly values international students and collaborations. However, federal regulations prohibit students from participating in SIU coursework or research activities while physically located in the following sanctioned countries, unless they have obtained a specific license from the U.S. government:</p> <ul style="list-style-type: none"> • Cuba - 31 CFR 515.201(a) • North Korea - 31 CFR 510.201(a)(3)(ii)(B) • Syria 31 - CFR 542.207 • Ukraine - E.O 13685 • Iran 31 - CFR 560.204 and 31 CFR.560.410(a) <p>Individuals from these sanctioned countries (“affected countries”) need an export control license to complete coursework or research activities from outside the United States. This is because the provision of online courses to an individual physically located within a country subject to comprehensive sanctions administered by the U.S. Department of the Treasury’s Office of Foreign Assets Controls (OFAC) constitutes an export of a regulated service. In addition to the provision of services for offering the course, the export of items other than general software to host the course may require a license.</p> <p>Note that the University may host and provide educational services to students and scholars in the U.S. from countries/regions subject to OFAC sanctions, provided such activities are in alignment with the respective individual’s visa. Those on non-immigrant visas may “carry out in the United States those activities for which such a visa has been granted.”</p> <p>Therefore, SIU must have a process for identifying students who may need a license or government authorization and prevent activities prohibited by OFAC sanctions.</p>		

Procedure:

1. Blocking Students from Enrolling in Online Degree Programs from Affected Countries

Students from the following countries are restricted from registering for online degree programs via logic that has been set up in the Slate system:

- Cuba
- North Korea
- Syria
- Ukraine
- Iran

2. Email to New Students from Affected Countries

Upon enrollment of a student from an affected country, the following email will be sent to the student via Slate:

Subject: Prohibited Activities from Outside the United States

Hello,

*Welcome to SIU! We highly value international students and are 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 and plan to remain here for the duration of your studies, 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 Controls](#)**. 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 [Export Controls](#) at the email listed below.

Wishing you a successful time at SIU!

Brenda Martin, Sr. Export Control Officer
bjmartin@siu.edu

3. Email to Continuing Students from Affected Countries

Prior to the beginning of each new academic year, students from the affected countries will be sent the following email via Slate:

Subject: Prohibited Activities from Outside the United States

Hello,

*As we start the academic year, we want to reach out to let you know that we highly value international students and are 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 and plan to remain here for the duration of your studies, 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 Controls](#)**. 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 [Export Controls](#) at the email listed below.

Wishing you a successful year at SIU!

*Brenda Martin, Sr. Export Control Officer
bjmartin@siu.edu*

4. Email to Academic Advisors and Graduate School Directors and Deans

Prior to the beginning of each academic year, the Export Controls Office will provide the following email to Shelly Gehrke to send to Academic Advisors and Elizabeth Benson to send to Graduate School Directors and Deans.

Dear Academic Advisors and Directors/Deans,

SIU highly values international students and collaborations. However, federal regulations prohibit students from participating in SIU coursework or research

activities while physically located in the following sanctioned countries, unless they have obtained a specific license from the U.S. government:

- Cuba
- North Korea
- Syria
- Ukraine
- Iran

Emails are sent to all students from the five countries listed, both upon admission and then again at the beginning of each academic year. The email may generate questions, which is why I wanted to reach out to you with this informational email.

Potentially impacted students are being advised to contact the [SIU 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 semester when they can be present in the United States.

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

If you have any questions, reach out to [SIU Export Controls](#).

Thank you for your understanding,

*Brenda Martin, Sr. Export Control Officer
bjmartin@siu.edu*

5. Communicating the Prohibition in Writing

- a. The prohibition is documented on the Export Controls website and the link was sent to other areas, including the Center for International Education, Extended Campus, Graduate School and the Registrar's Office.
- b. The following verbiage has been included in the Undergraduate and Graduate Catalogs

In order to follow U.S. federal regulations, students are prohibited from participating in educational and research activities, including coursework, while physically located in Cuba, North Korea, Syria, Ukraine or Iran without first obtaining the proper license. Students from these countries, but physically located in the United States or its territories do not need an OFAC license to attend or participate in online courses while in the United States or its territories. Individuals planning on participating in coursework, research or

other educational activities while located in Cuba, North Korea, Syria, Ukraine or Iran must contact Export Controls at exportcontrols@siu.edu prior to participating in any such activities.

- c. Students registering for classes each semester must complete the following certification in SalukiNet:

Title: *Prohibited Educational and Research Activities While Located in Cuba, North Korea, Syria, Ukraine or Iran*

Text: *In order to follow U.S. federal regulations, students are prohibited from participating in educational and research activities, including coursework, while physically located in Cuba, North Korea, Syria, Ukraine (certain areas) or Iran without first obtaining the proper license. If you are planning on participating in coursework, research or other educational activities while **located in Cuba, North Korea, Syria, Ukraine or Iran, you must contact [Export Controls](#)** prior to participating in any such activities.*

I certify that I will not participate in any educational or research activities, including coursework, while I am physically located in Cuba, North Korea, Syria, Ukraine or Iran without first contacting [Export Controls](#).