

From: Interim Dean Susan Ettner

Sent: Monday, August 17, 2020 2:06 PM

Subject: Important Information about Fall Quarter Students in OFAC-Sanctioned Countries

UCLA

Graduate Division

Dear Deans, Department Chairs and Vice Chairs, Management Services Officers, and Student Affairs Officers:

Following the reminder regarding the [U.S. Department of the Treasury's Office of Foreign Assets Control \(OFAC\) regulations](#) sent by the Office of Research Compliance & Policy on August 11, 2020, the Graduate Division has received requests for guidance on the implications for students. This memo provides clarifications.

In the absence of an export control license, UCLA is prohibited from providing remote instruction to graduate students who are physically located in a country or region subject to comprehensive OFAC sanctions (Iran, Syria, Cuba, North Korea and the Crimea region of Ukraine). This prohibition includes instruction provided to U.S. citizens, U.S. permanent residents and U.S. dual citizens. Moreover, UCLA is prohibited from providing remote instruction to graduate students who are from these countries, regardless of location, unless they will be physically located in the U.S. or ordinarily reside and will be physically located in a non-sanctioned state during their instruction.

UCLA does not currently have export control licenses allowing us to offer remote instruction for graduate students in affected countries or regions. Although the option of pursuing such licenses is being actively explored, the application process for export control licenses could take anywhere from 3 to 12 months or even longer, and approval is not guaranteed. UCLA will not have such a license for fall quarter. As a result, the current recommendation is for graduate students from affected countries who are unable to enter or return to the U.S. to work with their programs to defer matriculation (incoming students) or request a leave of absence (continuing students).

As each student's situation is different and the Graduate Division does not have access to data on anticipated location in the fall, we need you to work directly with your incoming and continuing students from comprehensively sanctioned countries or regions to ensure that the appropriate steps are taken.

We hope this provides clarity. If you have any questions regarding deferred matriculation for incoming students, please have the department SAO contact Susan Smith at ssmith@grad.ucla.edu. For continuing students, please contact academicservices@grad.ucla.edu.

With best regards,

Susan L. Ettner, Ph.D.
Interim Dean, Graduate Division