



MEMORANDUM

Office of the Chancellor
140501

TO: Deans, Directors, Department Chairs and Faculty

FROM: Vice Chancellor Roberto Peccei

RE: Foreign Assets Control

DATE: November 4, 2002

Last spring, I wrote about several federal regulations that are intended to promote national security and which have potential to impact current and proposed research projects. My April 3, 2002 memo was intended to raise awareness of these regulations and of the security concerns with which the University is required to conform.

Included in the April 3rd memo was discussion of the conduct of research in foreign countries against which the United States has imposed trade or economic sanctions. I am writing now to provide additional information about these regulations.

- In accordance with U.S. foreign policy and national security goals, the Office of Foreign Assets Control (OFAC) of the U.S. Department of the Treasury administers and enforces economic and trade sanctions against targeted foreign countries, terrorism-sponsoring organizations and international narcotics traffickers.
- At the current time, trade or economic sanctions, or restrictions on travel have been imposed on the following countries:

*Burma (Myanmar), Cuba, Iran, Iraq, Liberia, Libya,
North Korea, Sierra Leone, Sudan, and the Federal Republic
of Yugoslavia (Serbia and Montenegro)*

As the countries and organizations on this list are subject to change, please see <http://www.ustreas.gov/offices/enforcement/ofac/> if you are engaged in, or planning to travel to or conduct research in a foreign country.

- Regulations pertaining to each of the countries are not uniform. Nevertheless, with the exception of travel to Cuba (see below), it is my understanding that University faculty may not conduct research in most of the countries against which trade or economic sanctions have been imposed, nor move monies, equipment or materials to these countries, *unless* a special license has been granted *in advance* by OFAC for that activity. In some cases, special permission is needed for travel as well. In some instances, OFAC may issue requisite licenses. In other instances, the activities may be prohibited.

- In some instances, attendance at conferences or events in any of these sanctioned countries, or conferences organized or co-organized by the government or persons of sanctioned countries regardless of where they are held, may also be prohibited.
- The University of California Office of the President recently obtained a systemwide “umbrella” license from OFAC under which faculty, staff and students from any of the UC campuses may travel to Cuba for educational and research activities under the University’s auspices. The license authorizes travel for the purposes of research, formal study at a Cuban institution, teaching at a Cuban institution, and study in a structured educational program as part of a course offered by an accredited U.S. institution. It also allows faculty and staff to organize educational programs and exchanges and allows the University of California to sponsor Cuban scholars in the U.S.

The Office of Research at the UC Office of the President administers the license. To obtain proof of authorized travel to Cuba, UC affiliated faculty, staff and students should contact Dr. Carol McClain, Director of Multicampus Research, 1111 Franklin St., 11th Floor, Oakland, CA 94607 (510-987-9473 or Carol.McClain@ucop.edu) *prior to departure.*

If you are conducting research within a sanctioned country and you do not have a license, ***we will need to determine immediately whether an OFAC license is required and/or whether work needs to be stopped while a license is being sought. No new work should begin nor pending extramural awards accepted, until the same determination is made.*** Research support from a federal sponsor does not relieve UCLA of the responsibility of procuring those licenses when required.

I cannot stress enough the seriousness of OFAC in its intent to fine institutions and individuals who are not in compliance with these federal regulations.

If you have any questions, or if you are contemplating travel to any of these countries, submission of proposals to support research in these countries, collaboration with researchers in any of these countries, or transfer of funds, equipment or materials to any these countries please contact *Ann Pollack, Assistant Vice Chancellor – Research* (x40387 or apollack@resadmin.ucla.edu) to determine the need for a license.