

# OFAC Eases Rules to Allow for More Remote Learning in Iran During COVID-19 Pandemic

October 30, 2020

Yesterday, the Office of Foreign Assets Control (OFAC) issued [General License M](#), authorizing U.S. academic institutions to export certain online learning services and software to Iranian students to facilitate remote learning during the COVID-19 pandemic. Students that are in Iran, or are ordinarily resident in Iran, are eligible to receive services under the general license if they qualify for an F (student) or M (non-academic student) non-immigrant U.S. visa classification, have a U.S. visa, and are located outside the United States due to the pandemic.

OFAC also issued a [new FAQ](#) clarifying OFAC policy on the types of remote learning services and software that are authorized pursuant to other Iran general licenses. In the FAQ, OFAC indicates that [General License G](#) authorizes U.S. academic institutions to export services and related software that allow Iranian students to sign up for, and participate in, online undergraduate courses. OFAC also indicates that [Section 560.540](#) of the Iranian Transactions and Sanctions Regulations and [General License D-1](#) generally authorize exports of video conferencing software and educational technology software that allow students to view course materials, complete assignments, receive grades, participate in discussions and other remote learning activities, because those services are “incidental to the personal exchange of communications over the internet.” OFAC will prioritize the review of specific license requests for online learning services involving Iranian students that fall outside the scope of these general licenses.

Universities and technology companies using these licenses will need to pay close attention to the specific terms of each license in order to ensure compliance. For example, General License M does not authorize the export of software that is listed on the Export Administration Regulations [Commerce Control List](#). General License M currently expires on September 1, 2021.