Carnegie Mellon University Office of Research Integrity

and Compliance

RESPONDING TO REQUESTS FOR INFORMATION OR RESEARCH DATA FROM PERSONS IN EMBARGOED COUNTRIES (IRAN, SYRIA, SUDAN, NORTH KOREA, CUBA)

Faculty and staff at CMU often receive student, colleague, and industry requests from all over the world for information about research activities, programs, projects, and research results. While most of these requests are perfectly fine to respond to, some precautions are recommended when requests come from persons, institutions, or organizations in the current embargoed countries of Syria, Sudan, North Korea, Iran and Cuba. Although the United States sanctions for these countries are quite comprehensive and restrictive, they do differ among the sanctioned countries and are subject to change at any time. Therefore, the guidance given in this document is intended to be general in nature.

Most embargoed country sanctions restrict or limit the types of business that US persons can conduct with persons or entities located in these countries. When approached about giving research data, software programs or other technical information related to activities at CMU, care should be taken in disclosing information that could be viewed or interpreted as providing a service, technical assistance or something of value. As a general rule, publicly available information may be provided to persons or entities in embargoed countries, whereas the provision of products, software, technology or technical data may not be released without specific authorization from the U.S. Government.

- Requests for Publicly Available Information: It is best to direct the person to a public source for the information such as a website or journal article if the information is publicly available, rather than provide the information directly through email or other means of communication.
- All Other Requests: If the request is for information that is not available through a public source, please contact the Export Compliance Office at <u>export-compliance@andrew.cmu.edu</u> for guidance before taking action.
- Other Country Requests: Regardless of the country, if the information is <u>not</u> publicly available, contact the ECO for guidance. Depending on the type of data being requested there may be restrictions or limitations for other countries as well. The ECO will also provide assistance for <u>any</u> requests whenever you have any concern or doubt, regardless of the type of information or where it is going.