POLICY STATEMENT FROM THE VICE PROVOST FOR RESEARCH ON U.S. SANCTION AND EMBARGO PROGRAMS AND OTHER RESTRICTED PARTY REQUIREMENTS

Dear Colleague:

This Policy Statement addresses Yale’s compliance with United States (U.S) sanction and embargo programs and other restricted party requirements while maintaining a commitment to its mission and goals as an institution of higher education.

Yale is committed to research, education, and training in the international forum. Many members of the Yale community are citizens of foreign countries and the University engages in many activities overseas and with foreign parties. In conducting these international activities, Yale is obligated to observe and comply with federal laws, including economic sanctions and country embargoes. The United States Treasury Department, through its Office of Foreign Assets Controls (“OFAC”), administers and enforces trade and economic sanctions programs. These programs, implemented based on U.S. foreign policy or national security concerns, restrict or prohibit activities in certain countries or transactions with certain individuals and entities. These programs range from comprehensive embargoes that restrict nearly all economic activity with a given nation, to narrower sanctions based on specific foreign-policy considerations. Yale must comply with these requirements.

Yale also must comply with numerous sets of requirements put in place by other government agencies which limit or prohibit Yale’s ability to transact with certain individuals or entities (restricted parties). Each agency that promulgates such requirements maintains its own list of restricted parties. These requirements are put into place for multiple reasons, including to support national security or foreign policy objectives, implement professional disciplinary decisions, and support criminal law enforcement. The scope of these requirements can vary as well; some bar Yale from any interactions with a restricted party, while others impose only limited restrictions (e.g., exclusion from participation in federal healthcare programs). While OFAC-related restrictions are generally focused on international parties, many other requirements primarily restrict domestic parties.
Yale is committed to following restricted party-related laws and regulations, including U.S. embargo and sanction programs. Accordingly, Yale maintains a restricted party compliance program which includes screening individuals and entities with whom the University interacts against government exclusion lists. All members of the Yale community are expected to comply with these requirements and to follow Yale’s policies and procedures. Failure to comply would not only harm Yale’s reputation but could result in significant penalties for both the University and individuals involved. Members of the Yale community should not hesitate to reach out to the Director of Export Controls (donald.deyo@yale.edu) or other Yale offices (General Counsel, International Affairs) with any questions or concerns regarding this topic.

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