

Reinventing Academic Ties: Opportunities for U.S.-Iran Higher Education Cooperation

A Report on the IIE Iran Higher Education Initiative

July 2015



Institute of International Education (IIE)

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A Briefing Paper from IIE's Center for International Partnerships

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Table of Contents

Foreword	3
Executive Summary	4
Introduction	6
Snapshot of Iranian Higher Education	9
U.S.-Iran Academic Exchange	12
Current U.S.-Iran Academic Engagement	14
Potential for New Academic Relations	16
Rules and Regulations: Frequently Asked Questions about the Impact on U.S. Educational Institutions of U.S. Sanctions on Iran and U.S. Export Controls	20
Appendix A: Delegation Participant List	36
Appendix B: Delegation Agenda	37
Appendix C: Sample MOU	38
Appendix D: Amirkabir Suggestions for Potential Cooperation	39
Appendix E: Iranian University Brief Profiles	42

Foreword

Driving Forward in Iran

By Allan E. Goodman, President and CEO, Institute of International Education

The traffic in Teheran moves better than one would expect for a city approaching 15 million. The reason, it seems, is that drivers rarely use their rear view mirrors. Everybody focuses on moving forward. And they do. In the days ahead, the United States and Iran face some major choices about the kind of broader relations they want to have. While many on both sides will be inclined to keep looking in the rear view mirror, resisting the temptation to focus on the past may be the only way to begin facing today's challenges.

A recent visit of U.S. universities to Iran conveyed this spirit to move ahead. Our delegation visited 13 leading universities and research institutes across Iran. We discovered that despite the economic sanctions, scientific development and innovation in Iran has proved surprisingly resilient, and that enthusiasm for U.S.-Iran educational and scientific cooperation is accelerating, particularly in areas of water management, food security, stem cell research, nanotechnology, and health and environment sciences. Expanding academic engagement with Iran will bring more opportunities for joint research on pressing issues that affect us all.

Among the many benefits of academic cooperation, perhaps the most urgently needed is the opportunity to establish bonds with a country that has been all but out of reach to Americans for three decades. Given the high value both countries place on higher education, academic cooperation appears to be a logical base from which to begin moving toward better U.S.-Iran relations.

While some issues take years to be resolved through traditional bilateral diplomacy, this type of people-to-people diplomacy can begin to encourage better political relations immediately, and as expressed by several Iranian university presidents, it can even accelerate the diplomatic process.

Iranian President Hassan Rouhani, a pragmatist, recognized this benefit in 2013 when he spoke at a Council on Foreign Relations event in New York, arguing that an increase in civic dialogue could “foster more accurate knowledge and understanding among the people and leaders of our two countries, thwarting biases and false prejudgments from serving as bases for policymaking.”

Indeed, in the absence of normal diplomatic relations, academic exchange can be an effective alternative. But that's not the only reason why IIE is so often among the first to engage when relations thaw between countries. As educators, we are driven by the conviction that normal, competitive engagement between people and nations is required to advance the pursuit of knowledge essential for human and economic development.

Fortunately, our delegation witnessed a sector of Iranian society that shared our desire to begin building lasting relationships based on mutual benefit.

The rear view mirror is not a pretty sight, no matter who is looking. The memory of the past few decades coupled with difficult negotiations over Iran's nuclear programs will not be easy to overcome. But major milestones in peace have always come about when leaders are willing to look forward and open a new chapter in their history.

Executive Summary

In anticipation of the P5+1 countries adopting a nuclear deal with Iran and, in response to President Hassan Rouhani's 2013 visit to New York where he called for more international cooperation, IIE launched the IIE Iran Higher Education Initiative. Acting as a platform for a number of activities designed to increase U.S.–Iran academic relationships, the first step in launching the Initiative was a week-long delegation to Iran, led by IIE and joined by representatives from five U.S. colleges and universities.

Key Findings

A number of key findings emerged from the week-long delegation, which included informative site visits and exploratory discussions between U.S. delegates and Iranian counterparts. These include:

- 1. Internationalization of higher education institutions is a top priority for the Iranian government** and includes increasing academic relations with the United States.
- 2. The similarity of higher education systems in the United States and Iran** make the potential for cooperation much greater. Most Iranian universities work on a semester-based, credit-bearing system with typically four-year Bachelor's and two-year Master's degrees.
- 3. The desire from Iranian institutions to cooperate with U.S. higher education institutions** is supported by a high level of English language capabilities among the professoriate and student body, a strong scientific research landscape, and often the facilities to host international students and scholars.
- 4. The Iranian government funds overseas fellowships**, which allow Ph.D. students to spend six to nine months conducting research under supervision of a faculty member in the host country.

5. The most high-potential modes of cooperation include:

- Ph.D. sandwich programs and short-term research opportunities for Iranian Ph.D. candidates
- Joint Ph.D. advising
- Various dual degree/sandwich programs (e.g., 2+2, 1+1)
- Short-term/summer courses for U.S. students
- Short-term visiting faculty arrangements
- Virtual team teaching

(For a more in-depth discussion of potential models, see Section V.)

6. **Both countries critically need clarification** about rules, regulations, and which specific activities are possible or not possible. This white paper seeks to address these questions in Section V.

7. **Sanctions have had mixed effects on higher education.** In some cases, they have pushed the Iranian institutions to be innovative and self-reliant. However, lack of access to current publications, spare parts, laboratory equipment, and large data-analysis tools are just a few examples of ways sanctions have negatively impacted Iranian higher education. In many cases, false assumptions regarding sanctions have led to Iranian students and scholars being excluded from academic activities. For example, some Western publications have not published work from Iranian scholars, and the University of Massachusetts at Amherst banned Iranian students from enrolling in some graduate science and engineering programs for a time based on its reading of the sanctions, but it has since reversed that decision.

8. **Women are a major part of the academic landscape.** A large number of faculty and students, notably in the sciences, as well as the social sciences and humanities, are women. According to UNESCO, as of 2013, nearly half of all students enrolled in tertiary education were female, a consistent trend for more than a decade¹.

9. **There is interest in providing assistance to higher education and scientific research in developing countries,** especially Persian-speaking nations such as Afghanistan and Tajikistan. Iran has the potential to serve as a regional resource for U.S. government and World Bank efforts to build the higher education sector in Central and South Asia.

¹ UNESCO Institute for Statistics. Retrieved from <http://data.uis.unesco.org/?ReportId=168>

Introduction

The United States and Iran share a long history of excellence in higher education and fruitful academic cooperation. The 1960s and 70s were a particularly prolific time for U.S.-Iran academic engagement with tens of thousands of Iranian students studying in the United States.² Following decades of severely limited engagement between the two countries, President Hassan Rouhani has prioritized the internationalization of Iranian universities since 2013, citing the need for increased international cooperation between higher education institutions in Iran and abroad, including the United States. In response to this call for increased academic engagement, the Institute of International Education (IIE) launched the IIE Iran Higher Education Initiative to re-invigorate U.S.-Iran higher education cooperation and explore the potential for new and renewed bilateral activities.

This renewed emphasis on higher education internationalization is one in a number of promising growth trends in Iran. In 2013, GDP had risen to \$13,200 per person from \$4,400 a decade previously³. With a population double the size of that in the 1980s, 55 percent of Iranians in the relevant group were enrolled in higher education in 2012, representing a 34 percent increase from 2009, an increase that continues to climb⁴. With steady economic growth—and the promise of further investment and growth following adoption of the historic nuclear deal—higher education will continue to play an increasingly large role in Iran, a country that already has a robust domestic education system and a history of international academic cooperation.

The IIE Iran Higher Education Initiative

The IIE Iran Higher Education Initiative takes a multipronged approach aimed at taking advantage of this unique moment in U.S.—Iran diplomatic relations to expand educational cooperation with Iran. It includes a series of core components: the publication of this white paper; several IIE National Conference Calls, which provide an opportunity for U.S. and Iranian higher education representatives to discuss key policy issues and perspectives; and an exploratory delegation to Iran that took place in June 2015. This initiative seeks to provide a

² *Open Doors*

³ (2014, November). The revolution is over. *The Economist*. Retrieved from <http://www.economist.com/news/special-report/21628597-after-decades-messianic-fervour-iran-becoming-more-mature-and-modern-country>

⁴ (2014, November). The revolution is over. *The Economist*. Retrieved from <http://www.economist.com/news/special-report/21628597-after-decades-messianic-fervour-iran-becoming-more-mature-and-modern-country>

constructive platform for counterparts in both countries to learn about each other's systems, priorities, capabilities, and opportunities. It aims to dispel myths about the United States and Iran by disseminating reliable information, clarifying misconceptions, and bringing together key stakeholders from both countries to engage in meaningful dialogue so as to expand academic collaboration among students, faculty, researchers, and administrators from both countries.

U.S. Higher Education Delegation to Iran

From June 5–13, 2015, IIE led a U.S. university delegation to Iran to learn first-hand about the Iranian education system, meet with potential counterparts, explore possibilities for academic cooperation, and lay the groundwork for higher education partnerships. Led by IIE's President and CEO, Allan E. Goodman, the U.S. delegation included representatives from the following U.S. higher education institutions:

- Ball State University
- Pitzer College
- Rutgers, The State University of New Jersey
- University of Southern California (USC)
- Wayne State University

The delegation included site visits with universities and research institutes in Tehran, Shiraz, and Isfahan. Each site visit contributed to a better understanding of the rich history of higher education in Iran that persists through present day and a number of commonalities between the participating U.S. institutions and their Iranian hosts that indicate fertile ground for cooperation. Due to their ongoing relationships with universities in the rest of the world, in particular Europe and Asia, Iranian institutions are well-equipped for partnerships, and they share priorities and challenges similar to those of many U.S. institutions. The Iranian host institutions included:

- Alzahra University
- Amirkabir University of Technology
- Institute for Research in Fundamental Sciences (IPM)
- Isfahan University of Technology
- National Research Institute for Genetic Engineering and Biotech (NIGEB)
- National Research Institute for Science and Technology (IROST)
- Shahid Beheshti University
- Sharif University of Technology

-
- Tabataba'i University
 - University of Isfahan
 - University of Shiraz
 - University of Tehran

The delegates also held high-level meetings with representatives from the Ministry of Science, Research and Technology—one of three ministries that oversee higher education in Iran—and the coordinating ministry for the delegation. A full participant list and agenda can be found in Appendix A. While the bilateral relationship remains tenuous, the comprehensive visit revealed significant opportunity for engagement, desire by higher education institutions in both countries to increase joint activities, and a number of existing exchange mechanisms that can be utilized to further academic cooperation.

Snapshot of Iranian Higher Education

Iranian higher education is primed for increased cooperation with the United States. The history of bilateral collaboration, similar higher education systems, and the advanced nature of research are just a few aspects that have made Iranian institutions excellent partners for the U.S. institutions in the past and will support future partnerships going forward.

With approximately 4.5 million students enrolled in higher education in Iran, the country has at least 345 government-approved higher education institutions.⁵ The system also includes the world's third largest university, Islamic Azad University, which has more than 400 campuses and approximately 1.6 million students, as well as a number of globally ranked universities⁶. In the past decade, Iran's scientific output has increased by 575 percent, and the country reportedly publishes three times more books than all Arab nations combined⁷.

The education system is divided into two bodies: health sciences and non-health sciences. At the end of high school, students take a national exam. Those who plan to attend public

universities take the Konkur national entrance exam. The four main tracks of higher education include: medical and health sciences, engineering and technology, social sciences, and fine arts

List of Top 10 Universities in Iran

According to the Iranian Ministry of Science, Research and Technology, the following institutions comprise the top ten universities in Iran. Rectors from these institutions meet on a regular basis to share updates and advise the government on higher education policy.

Tehran University
Sharif University of Technology
Amirkabir University of Technology
Tarbiat Moderras University
Shiraz University
Iran Science and Technological University
Isfahan University of Technology
Isfahan University
Ferdowsi University

⁵ Iranian Ministry of Science, Research and Technology. (n.d.). Names of the public universities, affiliated non-governmental non-profit higher education institutions, research centers, research centers, universities, schools, centers of higher education, colleges of higher education centers approved by the Ministry of Science, Research and Technology [translated]. Retrieved April 9, 2014, from https://web.archive.org/web/20140409123627/http://www.msrt.ir/sites/Grad_Dept/DocLib4/%D9%81%D9%87%D8%B1%D8%B3%D8%AA%20%D9%85%D9%88%D8%B3%D8%B3%D8%A7%D8%AA%20%D8%A2%D9%85%D9%88%D8%B2%D8%B4%20%D8%B9%D8%A7%D9%84%D9%8A%20%D9%85%D9%88%D8%B1%D8%AF%20%D8%AA%D8%A7%D8%A6%D9%8A%D8%AF%20%D9%88%D8%B2%D8%A7%D8%B1%D8%AA.aspx

⁶ In an unpublished 2015 British Council report, Dr. Fatemeh Ahmadi discusses the recent rankings of Sharif University of Technology and Isfahan University of Technology (IUST) at 40 and 63 respectively in Times Higher Education's rankings of the top 100 world universities under 50 years of age.

⁷ (2014, November). The revolution is over. *The Economist*. Retrieved from <http://www.economist.com/news/special-report/21628597-after-decades-messianic-fervour-iran-becoming-more-mature-and-modern-country>

and architecture. Public universities are free of charge; however, Islamic Azad University and private institutions require tuition. Similar to students in the United States, Iranian students can earn a bachelor's degree, requiring anywhere from 124 to 140 credits in four years. Also much like in the United States, a master's degree takes about two years, and a Ph.D. for all non-health sciences and basic health programs averages 3–5 years. Students who study dental, medical, or pharmacology, however, enter straight into those programs from high school.

While Iran's education history spans centuries, its orientation towards the United States only really began in the 1960s when the style of education shifted from European to American. At that time, the close relationship between the United States and Iran meant increased scholarships for Iranians to study at U.S. universities. At this time, many U.S. institutions developed agreements and close academic relationships with Iranian counterparts including between the University of Pennsylvania and Shiraz University, Imam Sadgh University and Harvard University, and Abadan Institute of Technology with Lafayette University and MIT. While many such formal agreements are no longer in effect, a number of individual relationships have been sustained through ongoing research partnerships and other joint activities.

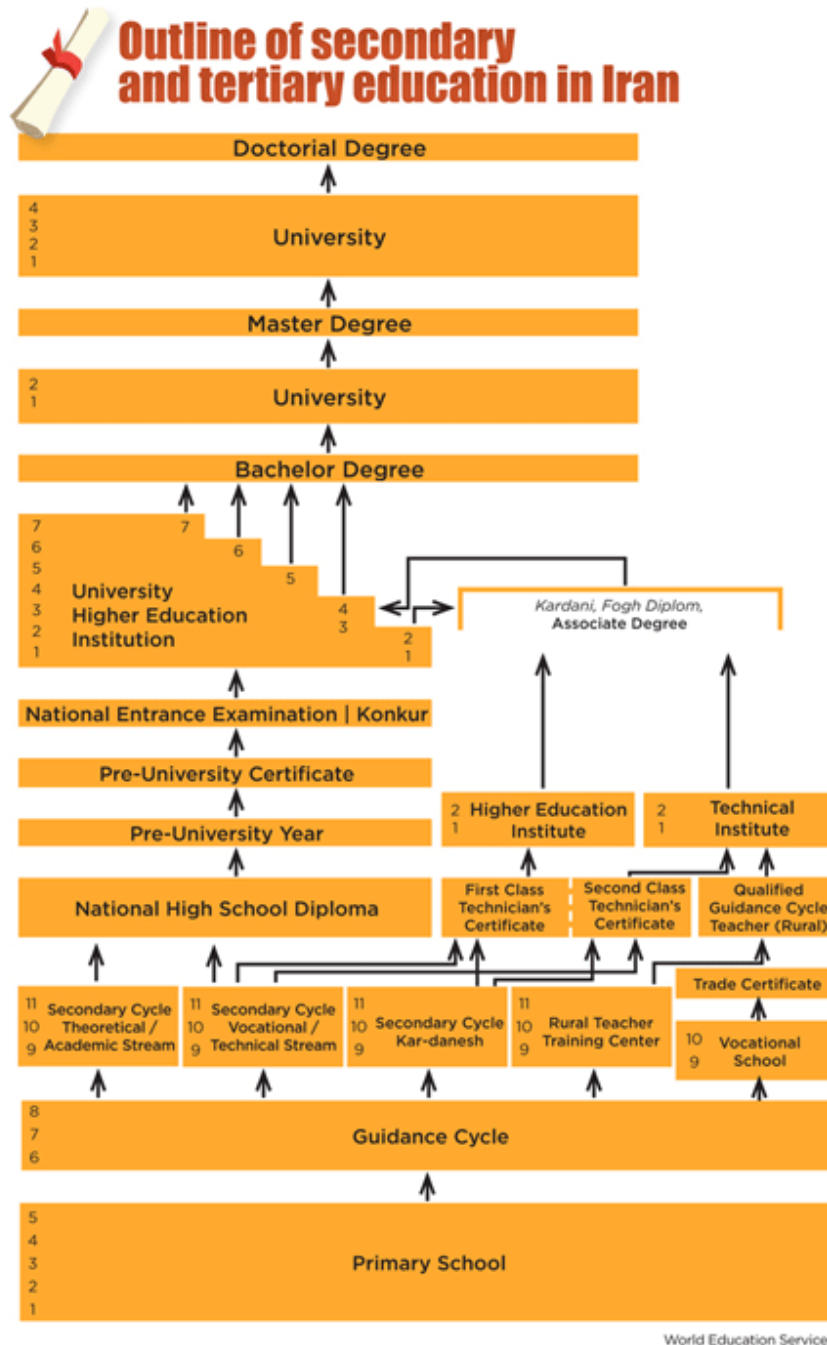
In fact, at each university site visit during the IIE delegation, many—if not the majority—of the faculty members and administrators that participated in the discussions had earned degrees in the United States. For example, at Tabataba'i University, representatives from the university had graduated from institutions such as the University of Texas at Austin, Florida State University, University of Tennessee-Knoxville, University of Wisconsin-Madison, Wichita State University, Florida International University, University of Missouri, and the University of Illinois. Their degrees ranged from statistics, counseling, and educational planning to theoretical economics, financial management, industrial management, and accounting. These links with U.S. higher education extend to the government as well, with six members of the Iranian cabinet holding American Ph.D.s. Several Iranians who received Ph.D.s in the United States even returned to universities in Iran to establish new doctoral level programs in their fields of study.

The lingering American influence on universities in Iran is reflected in myriad ways, including in an openness to change, exemplified by the large number of female students in all fields and the proliferation of degree programs in Entrepreneurship and Innovation. Furthermore, as in the United States, there is a consensus that higher education should foster growth in the private sector of the economy.

While Iranian law specifies that all courses must be taught in Farsi, a growing number of courses are now taught in English, and a new parliament is expected to pass a law formally

embracing this. According to the Iranian government, about 55,686 Iranian students studied outside of Iran in 2013, including approximately 7,000 who were enrolled in U.S. higher education.⁸

Figure 1: Outline of Secondary and Tertiary Education in Iran
(Source: World Education Services)



⁸ Political Desk. (2013, July 11). 14,000 foreign students studying in Iran. Tehran Times. Retrieved July 29, 2015, from <https://web.archive.org/web/20131011011927/http://www.tehrantimes.com/politics/109202-14000-foreign-students-studying-in-iran>

U.S.-Iran Academic Exchange

According to the *Open Doors 2014 Report on International Educational Exchange*, published by IIE with grant support from the Bureau of Educational and Cultural Affairs at the U.S.

Department of State, there were 10,194 students and 1,364 scholars from Iran at U.S. higher education institutions during the 2013–14 academic year. Iran was the top sender of students to the United States from 1974 to 1982, with the number of students from Iran peaking at 51,310 in the 1979–80 academic year. The number of Iranian students in the United States declined dramatically throughout the 1980s and 1990s, reaching a low of fewer than 1,700 students in the 1998–99 academic year. The number of Iranian students has risen steadily for the past nine years. The most recent enrollment figure, 10,194 for academic year 2013–14, is the highest in 26 years.

Figure 2: Iranian Students in the U.S.
(Source: *Open Doors Reports*)

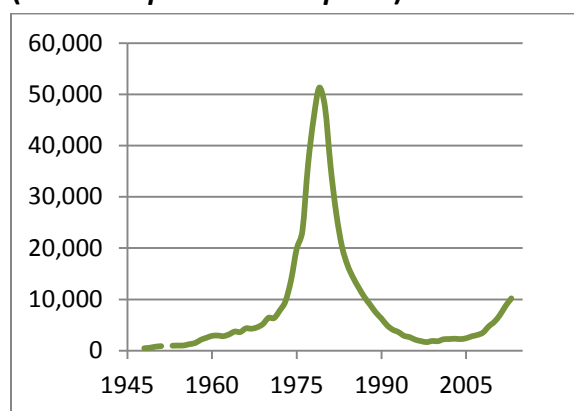
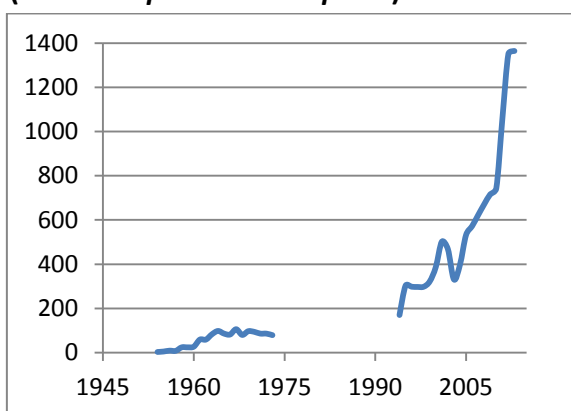


Figure 3: Iranian Scholars in the U.S.
(Source: *Open Doors Reports*)



The IIE Iran Higher Education Initiative

The vast majority of Iranian students in the United States are studying at the graduate level, and most are in the STEM fields, predominantly in engineering. Indeed 56 percent of Iranian students in the United States are studying in the field of engineering.

Figure 4: Academic Level of Iranian Students in U.S. Higher Education
 (Source: *Open Doors Report 2014*)

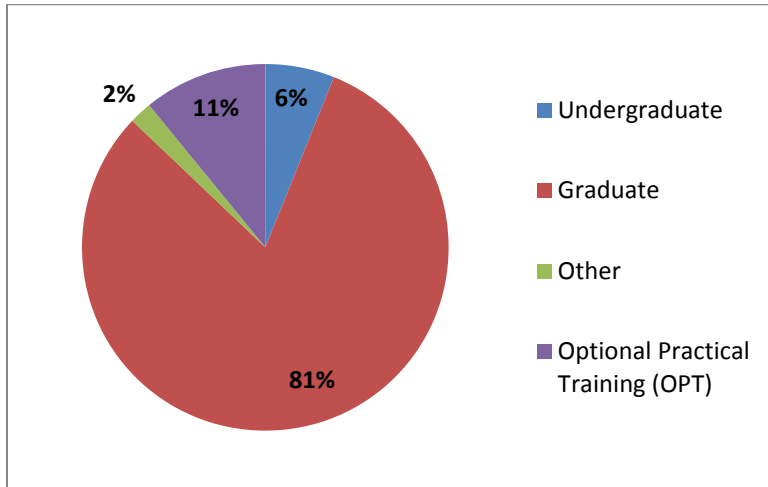
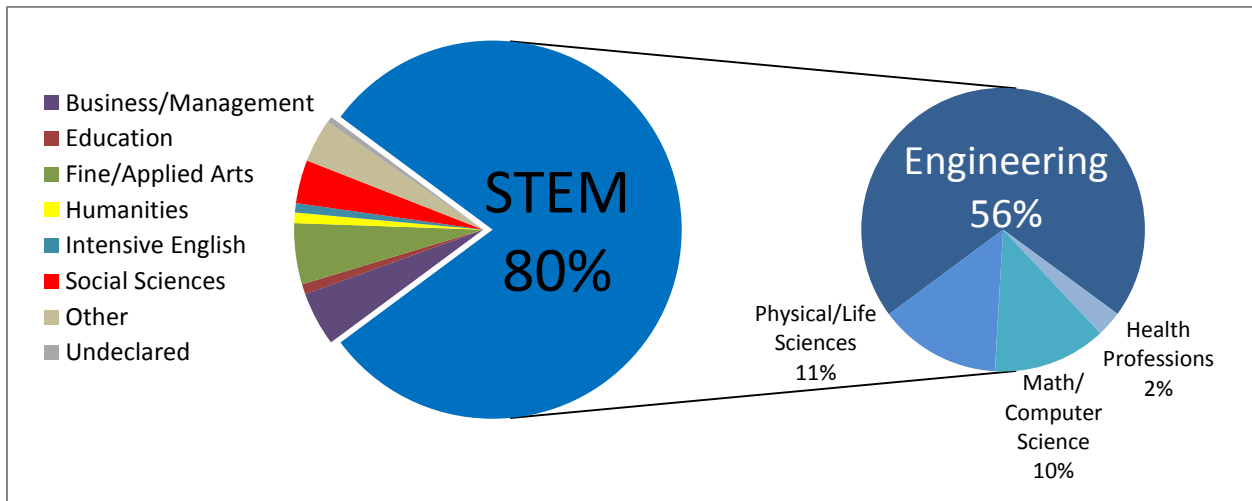


Figure 5: Areas of Study among Iranian Students in the U.S.
 (Source: *Open Doors Report 2014*)



In addition to more traditional student and scholar exchange, the potential for virtual enrollment is rising. The U.S. and Iranian governments now permit students in Iran to take undergraduate online courses offered by American universities, creating a channel through which to initiate and maintain international linkages in a cost-effective, innovative way.

Current U.S.-Iran Academic Engagement

U.S.-Iran academic cooperation has remained sporadic throughout the past several decades, with few—if any—formal agreements or programs between higher education institutions. All Iranian institutions we visited during the IIE delegation mentioned a range of current collaborative activities, such as dual degree programs, *co-tutelle* arrangements, joint symposia, joint publications, and many other common forms of academic engagement. However, these activities were rarely with U.S. counterparts. We even learned that some academics assumed they are unable to publish in U.S. scholarly journals because of misconceptions about the sanctions or about Iran.

Despite a generally low level of engagement, the last several years have seen an uptick in discrete initiatives that demonstrate a desire from both sides to continue or initiate new activities, even in a challenging political climate. The most frequently mentioned approaches included visiting researchers, joint conferences, and exploratory delegations. Some specific examples of recent U.S.-Iran collaborative activities include:

- In 2012, a small delegation from the American Association for the Advancement of Science (AAAS), led by Nobel laureate Peter Agre, visited Iran to deliver a series of lectures and meet with Iranian science leaders, researchers, and students.
- In 2013, faculty from Shahid Beheshti University participated in a training program on family matters in Turkey sponsored by the Johns Hopkins University's School for Advanced International Studies.
- In June 2014, the University of California, Irvine, hosted a U.S.-Iran Symposium on Resilient Cities, which brought together 34 invited scientists and engineers from Iran and the United States to share their knowledge and visions for developing resilient cities for minimizing impacts of environmental and other types of disasters. The Symposium was facilitated by the National Academy of Sciences and the U.S. State Department with a goal of contributing to the development of an improved roadmap for cooperation among national and international specialists concerned with the sustainability and resiliency of urban infrastructure systems including water, buildings, transportation, communications, and social and health services. The event was sponsored by the University of Arizona, National Academy of Sciences, and Sharif University of Technology.

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- In May 2015, the University at Albany, SUNY, arranged for two Iranian chancellors from leading medical schools to come to the United States for a one-week visit, which included a high-level meeting on U.S.-Iran cooperation in public health and the medical sciences held at the Institute of International Education in New York City. The visiting chancellors were from Isfahan University of Medical Sciences and Tehran University of Medical Sciences.
 - The University of Tehran's Faculty of Entrepreneurship acts as the Iran office for Babson College's Global Entrepreneurship Monitor (GEM), the largest and most developed research program on entrepreneurship in the world. The University of Tehran participates in this initiative by collecting and sending data to Babson for analysis. Four U.S. faculty attended last year's Conference on Entrepreneurship.
 - A delegation from Indiana University-Purdue University Indianapolis (IUPUI) led by Executive Vice Chancellor Nasser Paydar, and including the Dean of the School of Engineering and Technology, David Russomanno; the Associate Vice Chancellor for International Affairs, Gil Latz; and Executive Director Sara Allaei, Office of International Affairs, visited the University of Tehran in May 2015. An outcome of the delegation's visit is the resumption of a partnership with the College of Engineering at University of Tehran that will bring degree seeking undergraduate and graduate students in Mechanical Engineering and Electrical and Computer Engineering to IUPUI.

Potential for New Academic Relations

The conclusion from the IIE delegation, based on the many discussions held at each of the Iranian universities and research centers, is that there is high potential and desire for new or renewed academic cooperation from higher education institutions in both countries. One of the first steps will be to look at past memoranda of understanding and other agreements to determine which partnerships could be revived. While there is much we still have to learn about Iran today, our delegates felt this was a place where students and faculty would be warmly welcomed and could be very productive in undertaking joint research projects. As higher education institutions in both countries look for opportunities to re-establish and strengthen cooperation, there are a number of areas that will likely prove most promising. Whatever form initial activities take, there is a general consensus that it would be best to start with small dialogues and slowly cultivate partnership activities, possibly beginning with virtual activities. U.S. delegates plan to return to their campuses to communicate the learning outcomes from the visit and to connect U.S. and Iranian faculty in specific disciplines and research areas to explore areas of mutual interest. Many of the U.S. universities have already identified areas of possible cooperation.

The following are recommended areas and models for new U.S.-Iran academic relationships:

1. Areas of Potential Cooperation

Research

The potential for research cooperation is particularly strong. Academics in both countries have expressed desire for closer cooperation around areas of mutual interest. Despite the international sanctions, the knowledge base and the facilities we saw at the institutions we visited seemed particularly well developed.

There is particular interest in Iran in joint research in the areas of water conservation and environmental management. With years of declining precipitation and increases in waste and contamination, water shortage is a paramount issue in Iran. The United States is facing similar challenges, especially related to the long-term water shortages affecting the Colorado River basin and much of the Western United States. These are the headlines that we very seldom see coming out of Iran or the Middle East, but Iran and the U.S. share several similar challenges, and both countries have complementary, adaptable ways of addressing them, together. At a minimum, more cooperation and research on these issues and others related to environmental sciences and climate change will be very valuable for both countries, and were identified as

being high priority and high-potential fields for cooperative research. We can also expect to see more cooperation and research in the area of medical sciences, where there is already some joint research taking place.

Specific Disciplines

The following areas were discussed as potential areas for cooperation:

- Agriculture
- Urban development
- Persian studies
- Farsi language
- Gender studies
- Stem cell research
- Entrepreneurship
- Medical sciences
- Engineering
- Natural disasters
- Climate change
- Economics
- Ecosystems
- Anthropology
- Cultural studies
- American history

2. Modes of Collaboration

Joint Ph.D. advising, faculty exchange, and short-term study abroad for students were some of the most promising, feasible modes of collaboration discussed by the delegation with Iranian counterparts. With 24 percent of the Iranian higher education population participating in e-learning, virtual collaboration is also a promising avenue, especially for initial activities.

Additional mechanisms that were discussed during the delegation include:

- Professors performing research or teaching during sabbaticals
- Joint committees for joint conferences
- Joint scientific projects
- Virtual cooperation (e.g. co-teaching through virtual means)
- Joint Ph.D. advising (or sit on jury board)
- Joint articles
- Use of laboratories
- Share views on joint papers
- Technology transfer to private sector
- Establishing chairs at partner university

Student Exchanges

There are significant opportunities for expanding student exchanges. The number of Iranian students choosing to attend U.S. colleges and universities has been increasing and appears poised to continue to grow.

- **Ph.D. Student Placement:** The Iranian government offers scholarships for Ph.D. students to spend up to 9 months performing research abroad; however, the placement of these Ph.D. students is currently ad hoc and mostly left up to the individual. The ministries with whom we met welcomed counsel on how better centralize and engage more U.S. universities across the spectrum.
- **Bilateral Exchange Mechanisms:** As academic cooperation increases, bilateral programs will play in an increasingly important role. Language teaching assistants and visiting professors in both directions would be helpful in advancing academic ties. Other potential opportunities include fellowships for MA and MS students, since the current government of Iran support is primarily for Ph.D. students.
- **Combining Efforts:** While U.S. study abroad to Iran may not be widely popular at U.S. colleges and universities, the U.S. participants in the IIE delegation agreed that a consortium approach to initiating a short-term study abroad experience for their students would be effective. The majority of Iranian universities we visited discussed the possibility of creating short courses in English, given sufficient demand.

Dual/Double Degree Programs

Iranian institutions are particularly eager to explore the development of double degree programs, such as 2+2 and other models. International dual/double degree programs are study programs collaboratively offered by two (or more) higher education institutions located in different countries. They typically feature a jointly developed and integrated curriculum and agreed-on credit recognition. Students typically study at the two (or more) partnering higher education institutions (i.e., one home institution + one institution abroad). Upon completion of the study program, students receive degree certificates issued separately by each of the institutions involved in the program.

Area Studies

Iranian studies is also an area where Iran could help significantly by sharing its faculty and advanced doctoral students to teach in the United States, as U.S. colleges and universities consider what kind of programs they would like to offer. U.S. and Iranian higher education officials agree that the study of Iran has not been well defined; it is not effectively addressed in Arab studies or Middle Eastern studies programs, since Iran is neither an Arab country nor geographically part of the Middle East. Developing Iranian studies programs, in collaboration with partners in Iran, could contribute to Americans' knowledge of the area while also helping build the pipeline for U.S. study abroad to Iran.

Rules and Regulations: Frequently Asked Questions about the Impact on U.S. Educational Institutions of U.S. Sanctions on Iran and U.S. Export Controls

This section answers frequently asked questions (“FAQs”) posed by U.S. educational institutions regarding the effect of Iran sanctions on their ability to cooperate with Iranian schools and engage in educational exchanges. At the time of this publication, the Iranian nuclear deal reached on July 14, 2015 was pending review by the United States Congress and relevant parties in Iran. It is provided as background by Nicholas L. Townsend, Counsel, Arnold & Porter LLP; it does not constitute legal advice.

On July 14, 2015, the so-called P5+1 countries (*i.e.*, the United States, United Kingdom, Germany, France, Russia, and China) and Iran announced the Joint Comprehensive Plan of Action (“JCPOA”) to limit Iran’s nuclear program in exchange for lifting U.S. and international sanctions on Iran. U.S. sanctions relief will be phased in over time as Iran takes verifiable steps to fulfill commitments with respect to its nuclear program.⁹ Certain more limited sanctions relief has been granted in the near term.¹⁰

Even if Iran does satisfy its commitments and the U.S. grants the sanctions relief provided for under JCPOA, not all U.S. sanctions will be lifted. For example, the U.S. will continue to fully enforce sanctions that have been imposed on Iran for its support of terrorism and its human rights abuses. Moreover, if Iran violates the terms of JCPOA at some point in the future, there is the potential that sanctions could be re-imposed (“snapped back”).

As of the date of this paper, the U.S. embargo on Iran remains in place. The sanctions that have been suspended to date in connection with the Iranian nuclear deal will have limited impact on U.S. educational institutions.¹¹ The Iranian Transactions and Sanctions Regulations (“ITSR”) still prohibit the export, sale, or supply, directly or indirectly, from the United States or by a United

⁹ U.S. sanctions relief will be provided through the suspension and eventual termination of nuclear-related secondary sanctions, beginning once the International Atomic Energy Agency (“IAEA”) verifies that Iran has implemented key nuclear-related measures described in the JCPOA (“Implementation Day”).

¹⁰ The P5+1 decided on July 14, 2015 to further extend through Implementation Day the sanctions relief provided for in the Joint Plan of Action (“JPOA”) of November 24, 2013, as extended. This JPOA sanctions relief is the only Iran-related sanctions relief in effect at this time.

¹¹ The sanctions in question have been suspended as provided for in the JPOA dated November 24, 2013, including sanctions related to trade in petrochemicals, precious metals, and civil aviation and automotive parts, as well as certain related financial and insurance services. Additional exceptions will be granted as part of JCPOA for exports of commercial aircraft and spare parts to Iran.

States person, wherever located, of any goods, technology, or services to Iran. The ITSR also generally prohibits the import into the U.S. of goods and services from Iran.¹²

An authorization from OFAC is required before a U.S. university, student, or faculty member can engage in most exports or imports from Iran. The U.S. Treasury Department’s Office of Foreign Assets Control (“OFAC”) has issued a number of general licenses¹³ that authorize certain types of educational activities involving individuals and entities in Iran and there are also certain exceptions to the ITSR’s broad prohibitions, as discussed below. With limited exceptions,¹⁴ OFAC’s regulations generally do not authorize export of commodities or technology other than items that are not subject to the Export Administration Regulations (“EAR”), certain agricultural products, medicines, medical products and certain other non-sensitive products classified for export control purposes as EAR99, as discussed in more detail in Section IV of this paper.

The FAQs below are organized into four broad categories as follows: (1) travel, (2) student exchanges, (3) publishing/joint educational activities and cooperation on grants, and (4) export controls.

1. *Travel*

A. *Do U.S. students and professors travelling to Iran need clearance/approval from OFAC or any other U.S. government agency?*

No authorization is required for U.S. persons to travel to Iran, but participation in educational courses or academic research in Iran would need to be licensed by OFAC, as discussed below.

There is an exception to the prohibitions discussed above under Section 516 of the ITSR for travel to Iran. The ITSR’s travel exception covers all transactions “ordinarily incident to” such travel, including:

1. importation or exportation of accompanied baggage for personal use;

¹² Additional exceptions will be granted as part of JCPOA for imports of certain food, such as pistachios and caviar, and carpets from Iran.

¹³ Unlike a specific license, a general license does not require submission of an application to OFAC nor does OFAC need to affirmatively approve the activities in question. Instead, the individual or entity using the general license simply needs to meet the relevant criteria for the general license as specified in OFAC’s regulations.

¹⁴ For example, one exception is Iran General License D-1, which authorizes export, reexport, and provision of certain services, software, and hardware that are subject to the EAR in connection with personal communications in Iran.

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2. maintenance within any country, such as payment of living expenses; and
 3. acquisition of goods or services for personal use, and arrangement or facilitation of travel via air, sea, or land.

Although such travel and ordinarily incident transactions do not require a license from OFAC, an OFAC general or specific license would be required for students or professors to engage in certain activities in Iran, such as participating in educational courses or academic research. On March 19, 2014, OFAC issued Iran General License G (“GL-G”) authorizing certain academic exchanges and the exportation or importation of certain educational services. Among other things, GL-G authorizes U.S. persons who are actively enrolled in U.S. academic institutions to:

1. participate in educational courses or engage in noncommercial academic research at Iranian universities at the undergraduate level; or
2. participate in educational courses at the graduate level or engage in noncommercial academic research at Iranian universities in the humanities, social sciences, law, or business at levels above the undergraduate level.

The authorization above would cover most undergraduate students who travel to Iran to take classes or conduct academic research and it would also cover such activities by some graduate students. However, it would not cover graduate students in the areas of sciences, technology, engineering, and math because they would not be studying the humanities, social sciences, law, or business. Moreover, the provision above would not cover U.S. professors teaching courses or conducting research in Iran because such professors are not enrolled in U.S. academic institutions. Such professors are, however, authorized under GL-G to export services to Iran in support of not-for-profit activities in Iran related to increasing access to education, combating illiteracy, or assisting in educational reform projects or they could apply for a specific license from OFAC.

B. How should a U.S. university pay the in-country expenses for a short-term group study abroad experience?

U.S. universities generally may pay for expenses related to travel in Iran through their normal U.S. bank or financial institution. The ITSR’s travel exception discussed above extends to transactions with Iranian carriers and those involving group tours and payments in Iran made for transactions ordinarily incident to travel. Similarly, GL-G authorizes U.S. financial institutions to process transfers of funds in furtherance of activities authorized under the general license so long as the transfer is consistent with Section 516 of the ITSR.

Section 516 of the ITSR authorizes U.S. banks and financial institutions to process transfers of funds to or from Iran if the transfer arises from, or is ordinarily incident and necessary to give effect to, an underlying transaction authorized by OFAC. However, no U.S. bank may debit or credit an Iranian financial institution directly under Section 516; instead, the transfer must be made through a third-country bank.

U.S. universities should screen all parties to such transactions against the relevant sanctions lists because such payment of study abroad expenses must not involve any Iranian banks or entities that have been designated under sanctions programs other than the ITSR. For example, some Iranian banks and airlines have been sanctioned under OFAC's counter terrorism sanctions program or have been separately designated for their involvement with either Weapons of Mass Destruction ("WMD") or ballistic missile proliferation. Such entities have the [NPWMD], [SDGT], or [SDT] tag next to their names on the Specifically Designated Nationals ("SDN") List¹⁵. The U.S. government Consolidated Screening List, which includes the SDN List as well as other relevant screening lists, is available online at http://export.gov/ecr/eg_main_023148.asp.

The universities' payment instructions to the bank should clearly indicate that the transactions in question are authorized under GL-G or 31 C.F.R. § 560.210(d), which is the citation for the ITSR travel exemption discussed above. It is often advisable for the educational institution to call its bank in advance of establishing a new educational exchange program in order to avoid any confusion about whether the relevant Iran-related transactions are permissible under OFAC regulations. Otherwise, there is the risk that the bank may block (*i.e.*, seize) the funds.

C. Can you pay for travel to the U.S. for an Iranian professor/university official?

Yes. GL-G authorizes accredited graduate and undergraduate degree-granting academic institutions located in the United States ("U.S. Academic Institutions") to provide services related to the recruitment, hiring, or employment in a teaching capacity of Iranian individuals who are regularly employed in a teaching capacity at a university in Iran.¹⁶

¹⁵ Under Section 4.8.1 of Annex II of JCPOA, the U.S. committed to remove certain individuals and entities who have been designated in connection with nuclear-related sanctions from the SDN List and other U.S. sanctions lists. Removal of these entities will not occur until the IAEA verifies that Iran has fulfilled certain initial steps related to its nuclear program (*i.e.*, Implementation Day). Once these individuals and entities are removed from the sanctions lists, their property and interests in property will no longer be blocked under U.S. law. However, they remain subject to U.S. sanctions at the time of the writing of this paper and will likely remain so in the near term because it may be six to nine months before Implementation Day.

¹⁶ Under Section 4.8.1 of Annex II of JCPOA, the U.S. committed to remove certain individuals and entities who have been designated in connection with nuclear-related sanctions from the SDN List and other U.S. sanctions lists.

U.S. Academic Institutions should screen both the individual Iranian professor/university official and the Iranian academic institution for which he or she works against the Consolidated Screening List discussed above. This is important because GL-G does not authorize any transactions with Iranian persons whose property OFAC has blocked under sanctions that were not imposed under the ITSR. For example, some Iranian universities, such as Baghiatollah Medical Sciences University in Tehran, have been blocked due to their involvement with WMD proliferation and thus have the “[NPWMD]” tag as well as the “[IRGC]” and “[IFSR]” tags on the SDN List.¹⁷

2. *Student Exchanges*

A. *Can U.S. students or institutions pay a fee to an Iranian academic institution for organizing a study abroad program?*

Yes. GL-G authorizes U.S. Academic Institutions and their contractors to enter into student academic exchange agreements with universities located in Iran related to undergraduate or graduate educational courses. GL-G also authorizes U.S. Academic Institutions to engage in all activities related to such exchange agreements, which would include paying reasonable fees to the Iranian institution for organizing a study abroad program.

GL-G also authorizes U.S. students who are actively enrolled in U.S. Academic Institutions to participate in undergraduate-level courses and academic research at Iranian universities. GL-G also authorizes such students to participate in some graduate-level courses and research at Iranian universities, but only if they are in the humanities, social sciences, law, or business. (OFAC has not provided definitive guidance on this point, but there is a good argument that the authority to participate in such a course in Iran implicitly includes authorization to pay fees that would ordinarily be required as a condition of enrolling in such a class.)

Removal of these entities will not occur until the IAEA verifies that Iran has fulfilled certain initial steps related to its nuclear program (*i.e.*, Implementation Day). Removal from the SDN list could allow U.S. persons to engage with these entities if authorized under one of the OFAC general licenses discussed above. However, they remain subject to U.S. sanctions at the time of the writing of this paper and will likely remain so in the near term because it may be six to nine months before Implementation Day.

¹⁷ Other Iranian universities that are currently designated by OFAC, such as Sharif University of Technology and Shahid Beheshti University, are among the entities that will be removed from the SDN List under JCPOA after Implementation Day. However, the property and interests in property of such entities remain blocked at this time and they will be sanctioned until such time as OFAC affirmatively removes them from the list, which will not take place until after the IAEA verifies that Iran has fulfilled certain initial steps related to controlling its nuclear program.

B. Can Iranian students enroll in courses at U.S. universities and can the universities receive funding from the Iranian government in connection with such students (for example via a student scholarship program)?

Yes. Pursuant to Section 505 of the ITSR, students from Iranian universities who are otherwise qualified for a non-immigrant visa are authorized to carry out in the United States those activities for which such a visa has been granted by the U.S. State Department. Therefore, Universities may enroll or employ persons who are citizens of Iran if they are in the U.S. under a valid visa that authorizes them to study or work in the United States.¹⁸

There are two separate authorizations for U.S. universities to teach Iranian students who do not have visas because they are outside the U.S., but both limit the ability of Iranian students to take courses in science, technology, engineering, or math. First, GL-G authorizes U.S. Academic Institutions to export services to Iranian individuals who sign up for certain limited undergraduate level online courses (including Massive Open Online Courses, coursework not part of a degree seeking program, and fee-based courses).¹⁹ Second, Section 544 authorizes accredited U.S. undergraduate degree-granting academic institutions (“U.S. Undergraduate Institutions”) with undergraduate educational programs or undergraduate exchange programs in countries other than the United States or Iran to recruit, enroll, and educate students who are ordinarily resident in Iran in third countries (*i.e.*, not in the U.S. or Iran). However, such third country programs must be limited to the humanities, social sciences, law, and business.²⁰

¹⁸ The Iran Threat Reduction and Syria Human Rights Act of 2012 (“ITRSHRA”) requires that the State Department deny visas to citizens of Iran who seek to enter the United States to participate in coursework at an institution of higher education to prepare for a “career in the energy sector of Iran or in nuclear science or nuclear engineering or a related field in Iran.” 22 U.S.C. § 8771. Under Section 4.9.1 of Annex II of JCPOA, the U.S. committed to cease the application of, among other things, the ITRSHRA’s “exclusion of Iranian citizens from higher education coursework related to careers in nuclear science, nuclear engineering, or the energy sector” and to seek legislative action as appropriate to terminate such ITRSHRA requirements. However, such sanctions relief will not be granted until Implementation Day, as discussed above.

¹⁹ Such online courses are only authorized if they are the equivalent of courses ordinarily required for the completion of undergraduate degree programs in the humanities, social sciences, law, or business. Science, technology, engineering, or math courses are not authorized, unless they are introductory undergraduate level courses ordinarily required for the completion of undergraduate degree programs in the humanities, social sciences, law, or business.

²⁰ Section 544 of the ITSR authorizes Iranian students in such third country programs to enroll in undergraduate courses in math, sciences, and engineering that are required or electives for undergraduate programs in the humanities, social sciences, law, or business provided the following two conditions are met: (i) the undergraduate courses are required for the completion of the humanities, social sciences, law, or business program and are for “introductory,” non-major, freshman or sophomore equivalent courses only; or (ii) the undergraduate courses are required for the completion of the humanities, social sciences, law, or business program and are math-related

As to payment for such Iranian students, GL-G also authorizes U.S. Academic Institutions to export services in connection with acceptance of payments for tuition from or on behalf of individuals who are located in Iran, or located outside Iran but who are ordinarily resident in Iran. Section 551 of the ITSR authorizes U.S. financial institutions and private loan companies to engage in all transactions necessary to collect, accept, and process student loan payments from persons in Iran or ordinarily resident in Iran.

JPOA also provides for the establishment of a financial channel to facilitate “direct tuition payments to universities and colleges for Iranian students studying abroad, up to an agreed amount ...”²¹ The Obama Administration made a commitment as part of JPOA to establish financial channels to facilitate Iran’s payments of \$400 million in governmental tuition assistance for Iranian students studying abroad.

All parties to transactions involving Iran, including tuition payments or other scholarships paid to U.S. universities for Iranian students, should be screened against the Consolidated Screening List. As discussed above, the relevant OFAC authorizations do not cover Iranian entities or individuals that have been designated under sanctions programs other than the ITSR.

C. Are there any limitations on whether a U.S. student who completed graded course work in Iran may be denied credit based upon current U.S. policy?

No if the underlying studies in Iran were authorized and the student is not on the SDN List or otherwise subject to U.S. sanctions. However, please note that there are limitations on the type of courses U.S. students may take at Iranian universities, as discussed above. Specifically, U.S. students are only authorized to:

1. participate in educational courses or engage in noncommercial academic research at Iranian universities at the undergraduate level; or
2. participate in educational courses at the graduate level or engage in noncommercial academic research at Iranian universities in the humanities, social sciences, law, or business at levels above the undergraduate level.

accounting or economics classes at any undergraduate level, not to include courses allowing for any post-graduate work.

²¹ As discussed above, JPOA sanctions relief was extended as part of JCPOA.

U.S. students generally are not permitted to take graduate courses in sciences, technology, engineering, and math in Iran.

3. *Publishing/Joint Educational Activities and Cooperation on Grants*

A. *Can articles by Iranian university professors be refereed in U.S. journals?*

Yes. Section 538 of the ITSR authorizes certain publishing-related activities, including with persons from academic and research institutions. U.S. persons are authorized to engage in all transactions necessary and ordinarily incident to the publishing and marketing of manuscripts, books, journals, and newspapers in paper or electronic format (collectively, “written publications”). The general license in Section 538 covers:

1. Commissioning and making advance payments for identifiable written publications not yet in existence, to the extent consistent with industry practice;
2. Collaborating on the creation and enhancement of written publications;
3. Augmenting written publications through the addition of items such as photographs, artwork, translation, explanatory text, and, for a written publication in electronic format, the addition of embedded software necessary for reading, browsing, navigating, or searching the written publication;²²
4. Substantive editing of written publications;
5. Payment of royalties for written publications;
6. Creating or undertaking a marketing campaign to promote a written publication; and
7. Other transactions necessary and ordinarily incident to the publishing and marketing of written publications.

Section 538 does not authorize U.S. persons to engage the services of publishing houses or translators in Iran, unless such activity is primarily for the dissemination of written publications in Iran. Nor does Section 538 authorize such written publications if the

²² The Section 538 general license also covers exporting embedded software necessary for reading, browsing, navigating, or searching a written publication in electronic format, provided that the software is designated as EAR99 or is not subject to the EAR. Export restrictions are discussed in more detail in Section IV of this paper.

Government of Iran is a party to the transaction in question.²³ In this context, the Government of Iran does not include any academic and research institutions and their personnel, but screening of all relevant entities and individuals against the Consolidated Screening List is still necessary.

There is also an exception to the ITSR’s export prohibition for exportation to any country of information and informational materials. Under Section 210(c) of the ITSR, the term “information and informational materials” is defined to include publications, films, posters, phonograph records, photographs, microfilm, microfiche, tapes, compact disks, CD ROMs, artworks, and news wire feeds. However, under the informational materials exception, there are limitations on the ability of U.S. persons to make substantive enhancements to information and informational materials sent to Iran. The information and informational materials exemption does not apply to the substantive or artistic alteration or enhancement of informational materials, or to the provision of marketing and business consulting services. Nor does the exemption apply to transactions related to information and informational materials that are not fully created and in existence at the date of the transaction.

B. Can Iranians be on U.S. universities’ joint organizing committees for university workshops and/or can Iranian faculty serve on dissertation committees in the U.S.?

Yes if the Iranian in question is in the U.S. and such activities are authorized under his or her visa. Iranians are authorized under Section 505 of the ITSR to carry out in the United States those activities for which their visa has been granted by the State Department. However, as noted above, ITRSHRA prohibits the State Department from issuing education related visas in certain circumstances for Iranians whose activities relate to the energy sector of Iran or nuclear science or nuclear engineering, although the United States has committed to provide certain sanctions relief in this area after Implementation Day.

If the Iranian in question is in a third-country other than the United States or Iran, Section 544 of the ITSR authorizes U.S. Undergraduate Institutions that have educational programs or exchange programs in countries other than the United States or Iran to recruit individuals ordinarily resident in Iran—such as scholars, artists, performers, speakers, alumni, and students—to participate in events, such as conferences, lectures, film series, research workshops, exhibitions, theatrical and musical performances, and continuing education

²³ In the context of Section 538 of the ITSR, the term “Government of Iran” includes the state and the Government of Iran, as well as any political subdivision, agency, or instrumentality thereof, which includes the Central Bank of Iran (“CBI”), and any person acting or purporting to act, directly or indirectly, on behalf of any of the foregoing.

courses. The general license under Section 544 also authorizes U.S. Undergraduate Institutions to provide compensation, including honoraria, to such Iranians.

If the Iranian in question is in Iran, GL-G authorizes U.S. Academic Institutions and their contractors to export services related to the recruitment, hiring, or employment in a teaching capacity of individuals who are located in Iran, or located outside Iran but who are ordinarily resident in Iran if the individual in question is regularly employed in a teaching capacity at an Iranian university.²⁴

As discussed above, all such individuals and entities should be screened against the Consolidated Screening List.

C. Can U.S. persons serve on joint organizing committees for Iranian universities?

GL-G authorizes U.S. Academic Institutions and their contractors to enter into student academic exchange agreements with universities located in Iran related to undergraduate or graduate educational courses. It also authorizes all activities related to such agreements. If the joint organizing committee in question relates to such an exchange, GL-G would authorize U.S. faculty, staff, and contractors of such Academic Institutions to participate in the committee.

Moreover, U.S. persons are authorized to export services to Iran in relation to a committee in support of not-for-profit educational activities in Iran regarding access to education, combating illiteracy, and assisting in educational reform projects.

D. Can U.S. universities provide funds to Iranian institutions for services related to research?

Only if such payments are authorized by OFAC or exempt from the ITSR. For example, U.S. Academic Institutions could make payments to Iranian institutions under GL-G if the funds are for activities related to a student academic exchange agreement with a university located in Iran. This authorization would include the provision of scholarships to students enrolled in Iranian universities to allow such students to attend U.S. Academic Institutions.

There are also separate authorizations under GL-G and Sections 505 and 544 of the ITSR for certain types of transactions with individual Iranians in connection with licensed educational activities, as discussed above.

²⁴ Such an Iranian individual must still be granted an appropriate visa if he or she is employed in a teaching capacity within the United States.

All Iranian entities and individuals should be screened against the Consolidated Screening List.

E. What are the limitations on the use of grant funds for activities related to Iran?

Limitations on use of grant funds depend on the specific terms of the grant. Universities should carefully review the clauses related to sanctions and export controls in their grants, because they may place additional conditions on use of grant money that go beyond the basic legal requirements described herein.

The restrictions placed on recipients of federal grants vary depending on what department or agency awarded the grant. For example, funds provided by the Department of Defense (“DoD”), the National Aeronautics and Space Administration (“NASA”), the Intelligence Community (“IC”), and the Department of Energy (“DoE”) often have additional national security related restrictions that may not apply to money from other parts of the federal government. Some of these grant conditions may also impact the ability of the recipient university to take advantage of certain exemptions under U.S. export control laws.²⁵ For example, certain prepublication review requirements and restrictions may preclude use of the Fundamental Research Exception under the EAR.

While this section focuses on U.S. federal law, at least half of the individual states in the United States have their own sanctions laws.²⁶ The majority of these state laws relate to Iran or Sudan, but a number of states also have more general laws that apply to state sponsors of terrorism. State sanctions statutes vary from state to state, but they typically take one of two forms. First, many state legislatures have enacted measures restricting

²⁵ Research conducted for U.S. government national security agencies may not be subject to U.S. export licensing requirements depending on the restrictions in the grant or contract provided that the researchers follow the agency requirements so as to qualify for the protections under Section 734.8 of the EAR.

²⁶ However, JCPOA provides that: (i) if a law at the state or local level in the United States is preventing the implementation of the lifting of sanctions under JCPOA, the United States will take appropriate steps, taking into account all available authorities, with a view to achieving such implementation; and (ii) the United States will actively encourage officials at the state or local level to take into account the changes in the U.S. policy reflected in the lifting of sanctions under JCPOA and to refrain from actions inconsistent with the U.S.’ change in policy. Two federal laws also authorize states to enact such sanctions legislation. First, the Sudan Accountability and Divestment Act of 2007 authorizes states and local governments to adopt divestment measures involving (i) federally identified persons with investments and business in the Sudanese energy and military equipment sectors, or (ii) persons having a direct investment in or carrying on a trade or business with Sudan or the Government of Sudan, provided certain notification requirements are met. Second, Title II of CISADA also includes provisions authorizing state and local governments to divest from businesses making investments of \$20 million or more in Iran’s energy sector after adequate investigation and notification have occurred. Both laws provide that a measure falling within the scope of the authorization is not preempted by any federal law or regulation.

states and their agencies from conducting economic transactions with firms that do business with or in Iran, Sudan, or countries that have been designated as state sponsors of terrorism. Second, many states have passed laws requiring divestment of public funds, often including large state pension funds, from companies doing business in Iran, Sudan, or designated state sponsors of terrorism. Generally, such laws identify companies doing business in a country and, after giving the company in question notice and an opportunity to discontinue the offending activity, require divestment of public funds from those companies. Grants from state agencies or instrumentalities may contain conditions related to compliance with these state statutes. This means that in addition to checking the Consolidated Screening List published by the federal government, universities that receive state grants (and educational institutions that are themselves part of the state government) may need to check a list of companies identified by the relevant state as doing business with Iran, Sudan, or terrorists.

Grants from private foundations based in the United States may also contain sanctions related requirements. U.S. foundations that give money to entities in third-countries may require those foreign entities to comply with U.S. sanctions as though the non-U.S. entity was a U.S. person, even if the grant recipient is not directly subject to U.S. jurisdiction.

Although the specific conditions will differ depending on the type of grant and the text of the grant agreement, in all instances the underlying activities for which the university wishes to use the funds must be authorized by OFAC or exempt from the ITSR, as discussed above. A government grant does not convey authorization to use grant money in a manner that would violate OFAC or export control regulations. Therefore, the contemplated activities must be reviewed to ensure that they are consistent with the sanctions and export control laws discussed herein. This includes use of grant money by U.S. persons in Iran for sabbaticals or research, transactions with individuals located outside Iran but who are ordinarily resident in Iran, and services or payments made to Iranian universities and other entities.

4. Export Controls

A. What are the current controls on exports to Iran?

The application of U.S. export controls to Iran is complicated and requires fact specific analysis. At present, almost all shipments to Iran would require either a general or specific license.

The following is only a general overview. Universities should consult with their counsel or export control professional before any export of commodities, technology, or technical data to Iran or Iranian nationals.

The type of controls that apply to exports to Iran depend on what one wants to export. Thus, the first step in analyzing the applicable export restrictions is to determine the jurisdiction and classification of the item in question.

The export of an item may be under the jurisdiction of either the Commerce Department or the State Department, as discussed below. Most U.S.-based research falls under the EAR, which is administered by the Department of Commerce's Bureau of Industry and Security ("BIS"). The EAR governs dual-use goods designed for civil purposes that may be used in a manner that could present risks to U.S. national security and foreign policy. Examples of dual-use goods typical in a university setting include computers, lasers, lathes, biotechnology, and encryption. Items such as many laptop computers, personal computers, cell phones, personal digital assistants and other wireless handheld devices/blackberries, and other similar items are also subject to the EAR.

The State Department's Directorate of Defense Trade Controls ("DDTC") administers separate export controls under the International Traffic in Arms Regulations ("ITAR"). The ITAR covers the transfer of defense articles, including technical data, and defense services. In essence, the ITAR governs technology designed to kill people or defend against killing people. This includes traditional defense and weapons technology, but also certain types of civil space technology and defense against biological and chemical weapons applicable to civil protection, threats against airliners, certain robots and other technology frequently researched on university campuses. While it is theoretically possible to obtain appropriate waivers to authorize exports of ITAR-controlled defense articles, technical data, and defense services to Iran, in practice, it would generally not be worth the time and effort to seek such an authorization because almost all applications would be denied under current U.S. government policy under 22 C.F.R. Part 126.1.

The next step after you have determined whether the item in question is subject to the EAR or the ITAR is to determine what its export classification is. ITAR-controlled items are classified based on the U.S. Munitions List ("USML").²⁷ For example, military electronics are covered under USML Category XI and spacecraft and related articles are covered under USML Category XV. Items subject to the EAR are classified based on the Commerce Control

²⁷ The USML is available online at <http://www.ecfr.gov/cgi-bin/text-idx?SID=86008bdffd1fb2e79cc5df41a180750a&node=22:1.0.1.13.58&rgn=div5>.

List (“CCL”) using an Export Control Classification Number (“ECCN”).²⁸ For example, lasers are controlled under CCL Category 6, electronics are controlled under Category 3, and certain chemicals and toxins are controlled under Category 1. If your item falls under the jurisdiction of the Department of Commerce and is not listed on the CCL, it is designated as EAR99.

Finally, based on the jurisdiction and classification of the item in question, you can determine whether a license is required. In the case of exports to Iran or Iranian nationals, a license is often required, because the United States has imposed an embargo on Iran and Iran is also designated as a State Sponsor of Terrorism.

There are a number of licensing exceptions under both the EAR and ITAR, the most relevant of which for U.S. universities is the Fundamental Research Exception.²⁹ Such fundamental research in subject areas covered under the EAR is not subject to export licensing requirements for international scholars if the research is conducted on campus at an institution of higher learning in the United States. The key element for universities to preserve the ability to invoke this fundamental research protection is to ensure that the research may be published without restriction.³⁰ To qualify for the Fundamental Research Exception, it must remain free from publication controls.³¹ Moreover, while transfers on campus in the United States that qualify for the fundamental research exception may not require licenses for access by international scholars in the United States, collaboration with international scholars abroad may require licenses, depending on the technology exchanged, the destination country, the nationalities of the researchers involved abroad, and whether the exchange will be in a free and open conference.

Like the EAR, the ITAR includes a provision to permit research in the United States on ITAR-controlled technologies so long as no publication controls apply to the research. Research conducted under the ITAR’s fundamental research provision will not trigger licenses for “fundamental research in science and engineering at accredited institutions of higher learning in the U.S. where the resulting information is ordinarily published and shared broadly in the scientific community.”³² Such fundamental research is considered to be in

²⁸ The CCL is available online at <https://www.bis.doc.gov/index.php/regulations/commerce-control-list-ccl>.

²⁹ Similarly, basic coursework is not subject to U.S. export licensing requirements under the EAR if the institution follows the required parameters.

³⁰ This can occur in sensitive U.S. government research as well as private sector research.

³¹ The EAR includes an exception to allow prepublication review to remove proprietary information and a brief review for patentability concerns.

³² The ITAR defines fundamental research as “basic and applied research in science and engineering where the resulting information is ordinarily published and shared broadly within the scientific community, as distinguished

the public domain under ITAR Section 120.11(a)(8) and thus is not subject to the ITAR. However, university research will not be considered fundamental research if: (i) the University or its researchers accept other restrictions on publication of scientific and technical information resulting from the project or activity, or (ii) the research is funded by the U.S. Government and specific access and dissemination controls protecting information resulting from the research are applicable.

Aside from information which has resulted from fundamental research, all transfers of goods, software, or technology to Iran or an Iranian national generally would be subject to U.S. export controls. If the item in question is ITAR-controlled, a DDTC license is required.³³ There is a presumption of denial for exports to Iran under DDTC's current licensing policy.

As to the EAR, items generally may be exported to Iran without a BIS license if they are designated as EAR99 or are not subject to the EAR (*e.g.*, certain educational information as set forth in Section 734.9 of the EAR is not subject to the EAR).³⁴ Like DDTC, BIS maintains a presumption of denial with respect to exports to Iran³⁵. BIS may grant certain limited case-by-case exceptions for humanitarian reasons or for the safety of civil aviation and safe operation of U.S.-origin aircraft.³⁶

from research the results of which are restricted for proprietary reasons or specific U.S. Government access and dissemination controls.”

³³ Although the State Department permits the disclosure of unclassified technical data to foreign nationals who are bona fide and full time regular employees of a U.S. institution of higher learning if certain conditions are met, Iranian employees are not eligible because they are from a country to which exports are prohibited pursuant to §126.1 of the ITAR.

³⁴ In this context, “educational information” is information released by instruction in catalog courses and associated teaching laboratories of academic institutions. Dissertation research is also discussed in Section 734.8(b) of the EAR.

³⁵ A license is required under the EAR to export or reexport to Iran any item on the CCL containing a CB Column 1, CB Column 2, CB Column 3, NP Column 1, NP Column 2, NS Column 1, NS Column 2, MT Column 1, RS Column 1, RS Column 2, CC Column 1, CC Column 2, CC Column 3, AT Column 1 or AT Column 2 in the Country Chart Column of the License Requirements section of an ECCN or classified under ECCNs 0A980, 0A982, 0A983, 0A985, 0E982, 1C355, 1C395, 1C980, 1C981, 1C982, 1C983, 1C984, 2A994, 2D994, 2E994, 5A001.f.1, 5A980, 5D001 (for 5A001.f.1 or for 5E001.a (for 5A001.f.1, or for 5D001.a (for 5A001.f.1))), 5D980, 5E001.a (for 5A001.f.1, or for 5D001.a (for 5A001.f.1)) or 5E980.

³⁶ Under Section 5.1.1 in Annex II of JCPOA, the U.S. committed that after Implementation Day, it would allow for the sale of commercial passenger aircraft and related parts and services to Iran by licensing the: (i) export, re-export, sale, lease or transfer to Iran of commercial passenger aircraft for exclusively civil aviation end-use, (ii) export, re-export, sale, lease or transfer to Iran of spare parts and components for commercial passenger aircraft, and (iii) provision of associated services, including warranty, maintenance, and repair services and safety-related inspections, for all the foregoing, provided that licensed items and services are used exclusively for commercial passenger aviation.

EAR99 items that do not require a license from BIS would still require a general or specific license from OFAC for export by a U.S. person or from the United States to Iran or an Iranian national. Moreover, even if an item is EAR99 and its export is covered under one of the OFAC general licenses, there may be restrictions on its export to individuals or entities identified on the Consolidated Screening List, as discussed above.

The application of the relevant sanctions and export controls can be very fact specific. If you have questions please contact John Barker at (202) 942-5328 or John.Barker@aporter.com or Nicholas Townsend at (202) 942-5249 or Nicholas.Townsend@aporter.com.

U.S. sanctions laws often change rapidly and new sanctions are generally not broadcast in advance of their imposition, lest the target move its assets or otherwise attempt to avoid the impact of the sanctions. In the coming months, the sanctions on Iran will remain in flux. The most recent information about the nature and scope of OFAC sanctions related to Iran can be found on the OFAC website at <http://www.treasury.gov/resource-center/sanctions/Programs/pages/iran.aspx>.

Nicholas Townsend is a Counsel in Arnold & Porter LLP's National Security and Public Policy practices. Mr. Townsend's national security expertise is in international trade sanctions, U.S. export controls, and cybersecurity. He advises U.S. and foreign companies and educational institutions on compliance with U.S. and international financial sanctions on Cuba, Iran, Russia, Ukraine, and other countries. He is a graduate of Harvard Law School and the University of Michigan.

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This section does not constitute legal advice. Specific transactions should be reviewed against the applicable regulations to determine licensing requirements.

Appendix A: Delegation Participant List

Ball State University

Kenneth M. Holland, *Director of the Center for International Development*

Pitzer College

Michael Ballagh, *Associate Vice President for International Programs*

Rutgers, the State University of New Jersey

Joanna Regulska, *Vice President of Centers for Global Advancement and International Affairs*

University of Southern California

Anthony Bailey, *Vice Provost for Global Initiatives*

Wayne State University

Ahmad M. Ezzeddine, *Associate Vice President for Educational Outreach and International Programs*

Institute of International Education

Allan Goodman, *President and Chief Executive Officer*

Daniel Obst, *Deputy Vice President, International Partnerships*

Clare Banks, *Assistant Director, International Partnerships and IIE Initiatives*

Appendix B: Delegation Agenda

International Academic Partnership Program: 2015 Iran Study Tour

Saturday, June 6th —Tehran

- Delegates arrive in Tehran
- Meeting with Ministry of Science, Research, and Technology
- Site visit to Amirkabir University of Technology

Sunday, June 7th —Tehran

- Site visits to Shahid Beheshti University and Tabataba'i University

Monday, June 8th —Tehran

- Site visits to the University of Tehran, Alzahra University, and the National Research Institute for Genetic Engineering and Biotech (NIGEB)

Tuesday, June 9th —Tehran

- Site visits to National Research Institute for Science and Technology (IROST) and Sharif University of Technology, and the Institute for Research in Fundamental Sciences (IPM)

Wednesday, June 10th —Tehran

- Visit to Pardis Technology Park in Tehran

Thursday, June 11th —Shiraz

- Site visit to University of Shiraz
- Meeting with Zane University

Friday, June 12th —Isfahan

- Meeting with Isfahan University of Technology and University of Isfahan
- Depart for Tehran and international connections
- End of Study Tour

Appendix C: Sample MOU

(Coming Soon)

Appendix D: Amirkabir Suggestions for Potential Cooperation

The following document is a record of the discussion between the U.S. higher education delegates and representatives from Amirkabir University of Technology during the June 2015 delegation. These notes reflect potential opportunities for collaboration and do not represent any binding intentions or agreements. (See next page.)



Ref. Approaches for enhancing institutional linkages between Amirkabir University of Technology and the United States' universities/institution

Amirkabir University of Technology (AUT) is interested in cooperating with Ball State University, Pitzer College, Rutgers University, Wayne State University and the University of South California along with the Institute of International Education through the following methods:

- Student Exchange program
- Dual/double degree Program
- Joint Supervision

The items discussed and agreed with each university are summarized as follows:

Wayne State University

- Double degree at Master and PhD level , Bachelor level will be looked into
 - 3+2 (Bachelor + Master): Students will spend 3 years at AUT and two years in Wayne State University. After their first year in Wayne state they will receive a Bachelor's degree from AUT and after completing the second year at Wayne State University they will obtain a Master's Degree from Wayne State University.
 - 1+1 (Master): MSc students will spend first year at AUT and second year at Wayne State University
 - The University offers scholarships for non-residents
- Student Exchange programs at Bachelor, Master and PhD levels
 - Students may spend one or two terms at the host institution
 - Wayne State University may support the exchange students financially

Note: Standard credit transmission is 14 at MSc level

Rutgers University

- Double Degree at Bachelor, Master, and PhD level
 - 2+2 (Bachelors): BA students will spend two years at AUT and two years at Rutgers University
 - 3+2 (Bachelor + Master): Students will spend 3 years at AUT and two years in Rutgers University. After their first year in Rutgers University they will receive a Bachelor's degree from AUT and after completing the second year at Rutgers University they will obtain a Master's Degree from Rutgers University.
 - 2+2 (PhD): before implementing the dual PhD program, commutations and networking between faculty members from both parties should be established using the following methods:
 - Exchanging of faculty members
 - Conducting joint-supervision
 - Participating in referee committees of thesis/dissertation
 - Offering Joint courses
 - Holding joint seminar
- Student Exchange program at the graduate level
 - Graduate students will spend 6 to 9 months at Rutgers University.

Note: Standard credit transmission is 12 at MSc level



Ball State University

- 2 + 2 program: Double degree at Bachelor level
 - BA students will spend two years at AUT and two years at Rutgers University and will receive a degree from each University
- University offers graduate assistantship for Master students
- Student exchange program bilaterally between both parties

University of Southern California

- Double degree at Master level
 - MSc students will spend first year at AUT and second year at USC
 - MSc students will spend first year at USC and second year at AUT
- Joining the iPodia network which is a distance learning platform for students, where they will be able to join classes with two or three instructors from all around the globe
- Introducing programs that are faculty lead, where faculty members are sent abroad for research and students are given the chance to go along with a faculty member for a short period of time.
 - AUT or USC can show interest by hosting a group of students along with the faculty members from other party for research, overtime this can lead to joint research.

Pitzer College

- Double degree at Bachelor level
 - BA students will spend two years at AUT and two years at Pitzer College and will receive a degree from each University
- Joint-courses
- Student Exchange programs at Bachelor level
- Pitzer College is open to receiving students from Iran

Institute of International Education

- Hold a meeting virtually to discuss about regulations and intergovernmental issues that affect the exchanges. Some barriers may exist in performing and implementing the above mentioned collaborations:
 - Federal and governmental restrictions
 - Visa concerns
 - Wavering of tuition fees
- AUT will participate in the conference that IIE will hold in November in New York for networking engineering faculties worldwide

Amir Golroo
Director of International Relations

June 10th, 2015

Appendix E: Iranian University Brief Profiles

Institute for Research in Fundamental Sciences (IPM)



Location: Shiraz, Iran

Website: <http://www.ipm.ac.ir/>

Public/Private: Public

Institutional Description:

The Institute for research in fundamental sciences (previously the Institute for Studies in Theoretical Physics and Mathematics), often shortened to IPM is a government-sponsored advanced research institute founded in 1989 in Tehran, Iran. The institute was the first Iranian organization to connect to the Internet. It is also the domain name registry of .ir domain names.

The institute has four main campuses, all north of Tehran in the Farmanieh district, immediately south of Niavaran. It offers advanced Ph.D. degrees in areas such as Mathematical Logic and Plasma Physics among others.

IPM is directed by Mohammad Javad Larijani, its original founder.

National Research Institute for Genetic Engineering and Biotech



Location: Tehran, Iran

Website: <http://en.nigeb.ac.ir>

Public/Private: Public

Institutional Description:

The National Institute for Genetic Engineering and Biotechnology (NIGEB) was established in 1989 under the supervision of the Ministry of Science, Research and Technology. Since then, NIGEB has been given a mandate to undertake original, state-of-the-art research activities. It was established with dual purposes of promoting research in avant-garde areas of biological sciences and biotechnology as well as providing advanced training and educational programs for scientists and students from other universities and academic institutions.

Objectives of NIGEB:

- Implement mission-oriented scientific research in related fields of genetic engineering and biotechnology
 - Establish appropriate approaches for converting the research results into technology and upgrading the scale of productions to semi-industrial level
 - Marketing and commercialization of produced technologies
 - Collaboration for training researchers in various areas of biotechnology with regard to the priorities setting in the country's socio-economic program
-

National Research Institute for Science and Technology (IROST)

Location: Tehran, Iran

Website: <http://en.irost.org/>

Public/Private: Public

Institutional Description:

Iranian Research Organization for Science and Technology (IROST) was founded in 1980 in Islamic Republic of Iran shortly after the ratification of the IROST's Statute by the Council of Islamic Revolution with the aim of providing support to Iranian researchers, inventors and industrialists across the country. IROST mainly aims to devote itself to achieving independence in scientific and technological pursuit of the country. This organization provides valuable services in fulfilling the country's scientific, technical and engineering requirements through supporting applied and developmental research as well as developing new technologies by exploiting qualified experts and modern equipment and facilities.

The current president of IROST is H.E. Dr. Akbari.

Missions and Objectives:

- Provide support for the development of High Priority Technologies at national level, and offer consultations for evaluation, commercialization and marketing of these technologies at home and abroad
- Provide the grounds for effective utilization of research results by Leading Research to Production
- Encourage and expand research activities in the area of Modern Technologies
- Carry out Strategic Studies and Research , and Analyze Vulnerabilities to the national technology development system

-
- Evaluate patent applications, scientifically and professionally, and issue approval certificates for the grant of patents in the country
 - Hold Research-Oriented Ph.D. (Doctoral) Programs, and organize Short-Term Educational Workshops and Courses
-

Shadid Beheshti University

Location: Tehran, Iran

Website: www.sbu.ac.ir/

Public/Private: Public

Undergraduate student enrollment: 6,763

Graduate student enrollment: 4,784



Institutional Description:

Shahid Beheshti University (SBU), established in 1959 as the National University of Iran, started its academic life in 1960 with only 174 students in two faculties. Today there are more than 106 Bachelor's programs, 268 Master's, and 196 at Ph.D. levels. Development of new faculties in the main campus paved the way for increased academic activities, so that by 1978 several other faculties became active at SBU. SBU combines the tradition of a classical university with the dynamic character of a modern and interdisciplinary scientific enterprise. Since 1990, the university has placed more emphasis on postgraduate, in particular Ph.D., and research programs, while still aiming to enhance the quality of its well established undergraduate courses.

SBU has 19 faculties and is actively working with nine research institutes. Today, there are 199 programs at Bachelor's, 632 at Master's and 257 at Ph.D. levels, and there are 8,614 BA/BSc, 7,313 MA/MSc and 1508 Ph.D. students studying at the university.

Mohammad Mehdi Tehranchi is currently the President and professor of physics at Laser and Plasma Research Institute at Shahid Beheshti University (SBU). At the present time, in addition to the presidency of SBU, he is also in charge of the presidency of the Specialized Commission for Basic Sciences at the Council of Science, Research and Technology as well as the presidency of the Specialized Committee for Physics at the High Council for Higher Education Development.

Sharif University of Technology



Location: Tehran, Iran

Website: <http://www.sharif.ir/web/en/>

Public/Private: Public

Undergraduate student enrollment: 5,776

Graduate student enrollment: 4,726

Institutional Description:

Sharif University of Technology is one of the largest engineering schools in the Islamic Republic of Iran. It was established in 1966 under the name of Aryarmehr University of Technology and, at that time, there were 54 faculty members and a total of 412 students who were selected by national examination. In 1980, the university was renamed Sharif University of Technology. SUT now has a total of 300 full-time faculty members, approximately 430 part-time faculty members and a student body of about 12,000.

Sharif's Chancellor is Fotouhi Firouzabad, who graduated with honor B.Sc. as a first rank from Sharif University of Technology then he admitted in graduate program of University of Tehran where he got his M.Sc. He received a scholarship from Iranian Ministry of Science to pursue his studies in University of Saskatchewan in Canada, where he received an MSc and a Ph.D. degree from the University of Saskatchewan.

Shiraz University



Location: Shiraz, Iran

Website: <http://www.shirazu.ac.ir/en/>

Public/Private: Public

Undergraduate student enrollment: 11,839

Graduate student enrollment: 8,872

Institutional Description:

The initial nucleus of Shiraz University was formed in 1946 with the establishment of the Junior College of Health which aimed at training specialists in the Medical Sciences during a four year program. In 1949 this was transformed to a Medical College and shortly thereafter in 1953 the Namazi School of Nursing and in 1955 the Colleges of Agriculture and Arts and Sciences were established.

As a top Iranian University, Shiraz University is research-oriented and has about 630 faculty members and 17,500 students. The University offers BA/BS in 74 departments, MA/MS in 209 departments, and

Ph.D. in 140 areas of concentration. Shiraz University consists of 15 colleges. As a comprehensive and accredited University, Shiraz University has the responsibility of training qualified faculty staff for other higher education and research institutes in Iran. It has, thus, contributed a lot towards the scientific development of the country.

At present, Shiraz University has signed Memorandum of Understanding with 31 universities and higher education institutions in 16 countries.

University of Alzahra

Location: Tehran, Iran

Website: <http://www.alzahra.ac.ir/English/>

Public/Private: Public

Total student enrollment: 10,385



Vision:

Alzahra University hopes to rank as first among the comprehensive universities exclusively for women worldwide by the year 2026. It is a model for educated Muslim women who are committed to Islamic values. It has a vibrant and lively environment, as well as an inspirational and influential position in the region. This university is one of the first choices of Iranian girls intending to further their learning and enhance their research abilities and practical skills, and is recognized as an academic reference for studies on women and family issues.

Mission:

Alzahra University is symbolic of women's higher education in the country and is the most highly accredited comprehensive university exclusively for women at national, regional, and international levels. This university, based on Islamic teachings, the thoughts of the founder of the Islamic Revolution of Iran, and the guidelines of the Supreme Leader of the Islamic Republic, and benefiting from accomplished scholars and professors, aspires to producing novel academic theories and meeting the educational/research needs of the Islamic society, particularly women. Through increasing interaction with other organizations and academic/administrative centers, Alzahra University aims at paving the way for the presence of gifted women in such places. As an academic point of reference in particular fields, Alzahra University educates capable and professional women who can satisfy the needs of their country.

The university has 316 faculty members who are permanently employed and about the same number of guest lecturers who teach at present, about 9000 students study at different levels of education: undergraduate, Masters and Ph.D.

University of Amirkabir

Location: Tehran, Iran

Website: <http://aut.ac.ir/www/aut/main/>

Public/Private: Public

Undergraduate student enrollment: 5,514

Graduate student enrollment: 8,079



Institutional Description:

Amirkabir University of Technology is one of the oldest higher education technical and engineering institutes. AUT started its activities since 1958 and over time expanded its size and quality to the point that it is presently referred to as "Iran's mother industrial university".

Some the accomplishments of AUT are:

- Elevation to the status of Center of Excellence in mechanical engineering, electrical engineering, chemical engineering, textile engineering, medical engineering, aeronautics engineering, civil engineering and computer and information technology engineering
- Scientific and inter-university connections and signing MOUs with foreign universities
- Signing a large number of research contracts with various research and industrial centers
- Enjoying large and well-equipped laboratories and conducting outstanding important national projects like design and making of the fastest super-cluster computer and design, making, and launching satellites.
- Holding virtual training courses at the MSc level
- Being a pioneer in nuclear research and benefiting from the significant role of its faculty members and students in Iran's success in acquiring the nuclear fuel cycle

University of Isfahan, Science and Technology



Location: Isfahan, Iran

Website: <http://www.iut.ac.ir/en/>

Public/Private: Public

Undergraduate student enrollment: 7,500

Graduate student enrollment: 2,500

Institutional Description:

Isfahan University of Technology (IUT) is a young university with only twenty years of history. During this short period hard working faculty and administrators have transformed this institution into a highly competitive learning institution that is well recognized both locally and internationally.

IUT has ranked 3rd place in the number of senior students admitted into graduate programs in Iranian academic institutions. IUT as an institution of higher learning was established with the aim of satisfying the need to educate the youth in the central part of Islamic Republic of Iran, in the service of its peoples, and in the advancement of knowledge.

Currently IUT has over 9000 students of whom about 2000 are involved in post graduate programs. Its location in the heart of industrial complexes provides an opportunity to strengthen industrial enhancement of our country.

IUT is comprised of the College of Agriculture and twelve departments including different branches of Engineering and Basic Sciences. All of our departments encompass relevant areas of teaching and research. Our emphasis is in expanding and strengthening graduate programs and as a matter of fact many of our departments are offering Ph.D. programs in their field of expertise.

The President of Isfahan University of Technology (IUT) is Dr. Mahmoud Modarres-Hashemi.

University of Tabataba



Location: Tehran, Iran

Website: <http://atu.ac.ir/en>

Public/Private: Public

Undergraduate student enrollment: 15,624

Graduate student enrollment: 2,300

Institutional Description:

ATU Mission is to achieve excellence in the (inter)national areas of higher education by focusing on:

- Learning: ATU gathers a community of eager and independent learners, all headed toward gaining academic knowledge.
- Discovery: ATU expands and broadens knowledge, understanding, and academic horizons.
- Responsibility: ATU plays a positive role in the success of the country, in a variety of areas.
- Academic Entrepreneurship: ATU encourages learners to gain an entrepreneurial spirit toward knowledge and skill they learn at university.
- Research: ATU is famous for research in Humanities and Social Sciences.
- Student Welfare: ATU creates a comfortable atmosphere for all students to be able to gain knowledge and skill, and strengthen their understanding.

ATU Goals:

- improving the quality of education according to national and international standards;
- developing Interdisciplinary courses and fields;
- educating domestic and international students;
- growing qualitative and quantitative research based on the needs of the society;
- developing ATU research publications and commercializing ATU research findings;
- maintaining and enhancing the scientific collaborations with the national and international universities, research centers, and educational institutions;
- reviving the modern Iranian-Islamic culture , civilization, and ethics;
- improving students' physical and mental health and welfare

President:

Hossein Salimi, the president of the university, holds a Ph.D. in international relations. He was dean of Faculty of Law and Political Sciences and vice president for Student Affairs of the university before taking office as the president.

University of Tehran

Location: Tehran, Iran

Website: <http://www.ut.ac.ir/en>

Public/Private: Public

Undergraduate student enrollment: 15,312

Graduate student enrollment: 18,360



Institutional Description:

As the University of Tehran is the symbol of higher education of Iran, the main gate of the University in central Tehran, with its specific design and architecture is in a more general sense, a logo of education in Iran.

The academic staff of the University consists of 1,650 full-time faculty members and several hundred part-time and adjunct professors and affiliated members. The University of Tehran has a broad range of international adjunct faculty members. The University also employs 3,000 personnel who work at the different offices, institutes and centers.

The University has 19,000 undergraduate and 13,000 graduate students. The University has 6 colleges with a total of 39 faculties and 120 departments at its 7 campuses located in the cities of Tehran, Qom and Karaj as well as its Kish International Campus (in Kish Island). The University of Tehran, as the main research University of the Country, offers more than 300 post graduate programs.

Fifteen percent of the country's Centers of Excellence, as recognized by the government, are located at the University of Tehran, which along with more than 40 research centers ensure UT's commitment to research. Together, over 3,500 laboratories are active in these centers and in the faculties. In addition, the University of Tehran publishes more than 50 scientific journals, some of which have the ISI index.

Mahmoud Nili Ahmadabadi is a professor of Metallurgy at the University of Tehran, and current Chancellor of the University of Tehran. He is at the same time head of the Center for Excellence for Higher Performance Material at the University of Tehran.

About the Institute of International Education

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About IIE's Center for International Partnerships

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- Guiding colleges and universities through a customized partnership planning process to develop institutional strategies for fostering international partnerships.
- Conducting training activities focused on implementing and sustaining partnerships with higher education institutions in a focus country.
- Providing advice and liaison services through IIE's network of international offices and partners. Collecting and disseminating best practices in developing institutional linkages and programs.
- Convening conferences and symposia of international educators and other leaders in the field.
- Producing timely policy research papers on critical issues.
- Organizing U.S. study tours for higher education administrators and experts from around the world to enrich their understanding of U.S. higher education's diversity and bring them together with potential partners.

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