To: Deans, Department Chairs, and Center Directors   Date: April 15, 2010

From: Jack. Johannes, VPAA

Subject: Distance Learning Policy for Students Located in Certain Sanctioned Countries

As you know, Villanova always seeks to comply with federal and state government policies and regulations. Recently the University adopted a policy relating to export controls, including distance learning. Accordingly, the following statement outlines Villanova University’s strict policy of compliance with U.S. export controls laws and regulations, including U.S. economic sanctions and embargos, in connection with distance learning services. These laws impose obligations on certain distance learning activities, and compliance with them is essential.

Distance learning services provided to students overseas implicate U.S. export controls laws and regulations. Distance learning includes telecommunications-assisted learning and off-site learning. Accordingly, please note the following:

- Under U.S. law, exports to Cuba, Sudan, and Iran are strictly prohibited.
- This includes the export of goods, technology, and services.
- The prohibition on the export of services includes distance learning services.
- For these reasons, it is the policy of the University that no distance learning services will be provided for students who are physically located in Cuba, Sudan, and Iran without appropriate authorization from the U.S. Government.
- This prohibition does not apply to the distance instruction of students from Cuba, Sudan and Iran who are physically located in the United States at the time the distance learning services are provided.
- Posting homework, assignments and course description on a public website for which no login or password is required is acceptable. However, having specific questions asked by a student physically located in a sanctioned country and then answered by a Villanova professor is not permissible.

Please forward this to all appropriate faculty and staff in your area. If you have any questions or comments, please contact Kathy Hastings by phone at (610) 519-7857 or by email at katherine.hastings@villanova.edu. If you are aware of any export of goods, technology, or services to Cuba, Sudan, or Iran, please contact Kathy. Thank you for your attention to this very important issue.