

Congress of the United States

Washington, DC 20515

September 15, 2026

Sudha Setty
President and CEO, Law School Admission Council
662 Penn Street
Newtown PA 18940

Dear President Setty,

We write regarding alarming reports that the Law School Admission Council (LSAC) has broadly suspended the accounts of individuals of Iranian nationality or heritage, including U.S. citizens, lawful permanent residents, and individuals otherwise residing in the United States. While we understand that these actions were taken with the aim of complying with the Office of Foreign Assets Control's (OFAC) suspension of General License G under its Iran Sanctions program, we are deeply concerned by LSAC's apparent practice of identifying individuals for account restriction based on Iranian nationality rather than making an individualized determination based on where an individual actually resides and whether any other legally relevant nexus to Iran exists.

The Iranian Transactions and Sanctions Regulations (ITSR) restrict certain services provided to Iran, the Government of Iran, or persons in Iran. Importantly, however, these provisions do not make Iranian nationality, standing alone, a basis for prohibiting services. That distinction is particularly important following OFAC's August 24, 2026 suspension of Iran General License G, which had expressly authorized certain educational and testing services for individuals located in Iran or located outside Iran but "ordinarily resident" in Iran. While the term "ordinarily resident" is not defined under the ITSR, it is clear that Iranian nationality alone does not meet this requirement.

Indeed, the ITSR defines a U.S. person as "any United States citizen, permanent resident alien, entity organized under the laws of the United States or any jurisdiction within the United States (including foreign branches), or any person in the United States." Thus, individuals of Iranian nationality who are also U.S. citizens, lawful permanent residents, or otherwise present in the United States qualify as U.S. persons for the purposes of the ITSR.

The suspension of General License G removed an authorization that had extended to individuals meeting those location- or residence-based criteria; it did not transform Iranian nationality itself into a prohibited sanctions nexus. As such, LSAC's broad suspension of the accounts of all individuals of Iranian nationality or heritage regardless of residence is an egregious overcompliance that has unfairly targeted impacted American citizens and residents based on national origin alone.

Our offices have heard from several U.S. citizens and residents of Iranian nationality or heritage who had their accounts suspended without warning on September 9th and September 10th. This has caused

widespread distress among aspiring law students, as it has caused significant disruption to their law school application process through no fault of their own. These suspensions occurred at a particularly consequential point in the admissions cycle and created uncertainty regarding candidates' ability to sit for scheduled examinations, access their accounts and application materials, and meet admissions deadlines. For candidates with an imminent examination or application deadline, restoring an account several days later may not fully remedy the resulting harm.

We are also concerned by reports of markedly different treatment of similarly situated candidates. Some individuals reportedly had their accounts restored almost immediately after contacting LSAC and establishing U.S. citizenship or residence; others received no meaningful response, conflicting or inaccurate information, substantial delays, or even instructions suggesting that they should not appear for a scheduled examination. This inconsistency raises serious concerns about whether LSAC had established a uniform compliance policy and review process before suspending the accounts, and whether LSAC representatives were provided adequate and consistent guidance for responding to affected individuals.

We have also learned that LSAC's restrictions are not limited to account access. Students have reported that, even after access to their LSAC accounts was restored, they remained unable to submit law school applications through LSAC's system. This suggests that restoring account access does not necessarily restore full access to LSAC's services or remedy the disruption caused by the initial restriction. For applicants facing approaching admissions or scholarship deadlines, any continued inability to submit applications may result in significant and potentially irreparable consequences.

We remain deeply concerned that these restrictions appear to have been and continue to be imposed based on Iranian nationality or heritage, rather than on an individualized assessment of residence or any other legally relevant sanctions nexus. The apparent use of Iranian nationality or heritage as a proxy for Iranian residence raises serious national-origin discrimination concerns, particularly where U.S. citizens and permanent residents reportedly have been affected without an individualized determination of residence or sanctions status.

OFAC announced the suspension of General License G on August 24 and provided a wind-down period through September 8. LSAC therefore had approximately two weeks to evaluate the regulatory change, determine which candidates were actually affected, seek clarification or guidance if necessary, establish a review process, and notify potentially affected candidates. Instead, the reported suspensions began immediately after the wind-down period and immediately before scheduled examinations. The fact that there were no apparent efforts made by LSAC during this period to determine whether individuals were ordinarily resident in Iran, or give them a warning before suspending their accounts, is troubling. The result has been to shift the burden onto U.S. citizens and residents to prove that they are entitled to access LSAC services after their accounts have already been restricted.

Accordingly, we urge LSAC to:

- **Immediately review and restore improperly restricted accounts.** LSAC should promptly review, and where appropriate restore, the accounts of U.S. citizens, lawful permanent residents,

and other individuals residing in the United States whose accounts have been restricted solely or principally because they are Iranian nationals.

- **Disclose the criteria used to identify accounts for restriction.** LSAC should provide a clear explanation of the criteria used to identify the accounts selected for restriction, including whether LSAC relied on nationality, country of birth, ancestry, names, languages, address or location information, or any other screening criteria or data points.
- **Explain LSAC's preparations during the wind-down period.** LSAC should describe what steps it took between August 24 and September 8 to evaluate and implement the suspension of General License G, including whether it sought guidance from OFAC or other sanctions counsel, and why affected candidates were not provided advance notice or an opportunity to establish their eligibility before their accounts were restricted.
- **Establish a clear and expedited review process for affected candidates.** LSAC should implement and publicly communicate a prompt process through which affected candidates can establish their eligibility and obtain restoration of their accounts, particularly where an examination or admissions deadline is imminent.
- **Provide uniform guidance to LSAC representatives handling these matters.** LSAC should ensure that candidates receive consistent and accurate information regarding the basis for any restriction, the documents necessary to resolve it, their ability to sit for scheduled examinations, and the expected timeframe for review.
- **Ensure that candidates are not penalized.** LSAC should ensure that candidates do not suffer adverse consequences from missed examinations, application deadlines, reporting deadlines, or other disruptions resulting from an erroneous suspension, delayed review, or inaccurate instructions provided by LSAC.

We look forward to your response, and ask that you provide a response no later than September 28, 2026.

Sincerely,


Yassamin Ansari
Member of Congress


Dave Min
Member of Congress