

# CAATSA Sanctions

A Practitioner's Reference Guide

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Countering America's Adversaries Through Sanctions Act (P.L. 115-44)

**Iran | Russia | North Korea**

*Prepared for sanctions compliance professionals.*

*Current as of May 2026. Always verify against OFAC's official publications.*

# 1. Overview and Legislative Framework

On August 2, 2017, President Trump signed the Countering America's Adversaries Through Sanctions Act (CAATSA), Public Law 115-44, into law. CAATSA is organized into three titles, each addressing a distinct foreign policy threat:

Title	Short Name	Target Country
Title I	Countering Iran's Destabilizing Activities Act of 2017	Iran
Title II	Countering Russian Influence in Europe and Eurasia Act of 2017	Russia
Title III	North Korea Sanctions Act (expansions to NKSPEA)	North Korea

OFAC notes explicitly that **differing foreign policy and national security objectives may result in differing interpretations of similar language across the three titles**. Program-specific guidance, FAQs, and documents therefore differ by title. The statute was passed with strong bipartisan support (Senate 98–2; House 419–3) and was motivated by Russia's interference in the 2016 presidential election, its continued involvement in Ukraine and Syria, North Korea's weapons programs, and Iran's destabilizing activities.

## Legal Architecture

CAATSA sanctions are implemented through a layered framework of authorities:

- **Statute:** CAATSA itself (P.L. 115-44), which imposes mandatory and discretionary sanctions obligations on the President, the Secretary of State, and the Secretary of the Treasury.
- **Pre-existing statutory authorities:** IEEPA (50 U.S.C. §§ 1701–1706), NEA (50 U.S.C. §§ 1601–1651), SSIDES (Support for the Sovereignty, Integrity, Democracy, and Economic Stability of Ukraine Act of 2014), NKSPEA (North Korea Sanctions and Policy Enhancement Act of 2016), and various Iran-related statutes.
- **Executive Orders:** Most importantly E.O. 13849 (September 20, 2018), which delegated presidential authority under CAATSA's menu-based sanctions provisions to the Secretaries of State and Treasury and authorized implementation of the Section 235 sanctions menu.
- **OFAC Regulations (CFR):** 31 CFR Part 589 (Ukraine-/Russia-Related Sanctions Regulations) and 31 CFR Part 510 (North Korea Sanctions Regulations). Iran-related CAATSA provisions are implemented through existing Iran program regulations and the Global Terrorism Sanctions Regulations (31 CFR Part 594).
- **Directives:** Ukraine-/Russia-related Directives 1, 2, and 4 (each as amended on September 29, 2017), which implement Russia's sectoral sanctions as modified by CAATSA Section 223(b)–(d). Directive 4 was further amended on October 31, 2017.
- **Delegations of Authority:** On September 29, 2017 and October 12, 2017, the President delegated specific CAATSA authorities to the Departments of State and Treasury and the Director of National Intelligence.

## 2. Title I — Iran: CAATSA Section 105

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Title I, the Countering Iran's Destabilizing Activities Act of 2017, addresses Iran's ballistic missile program, arms embargo violations, and IRGC-related activities. The primary OFAC-implemented provision is Section 105.

### Section 105: IRGC Designation Requirement

Section 105 of CAATSA mandated the imposition of E.O. 13224 (global terrorism) sanctions on Iran's Islamic Revolutionary Guard Corps (IRGC) and on foreign persons who are officials, agents, or affiliates of the IRGC.

#### *Implementation Actions:*

- **October 13, 2017:** OFAC designated the IRGC as a whole under E.O. 13224, based on its support for the IRGC-Qods Force (which had previously been designated for supporting various terrorist groups).
- **October 31, 2017:** OFAC amended the Global Terrorism Sanctions Regulations (31 CFR Part 594 — GTSR) to block the property and interests in property of foreign persons identified by OFAC as officials, agents, or affiliates of the IRGC.
- **Consequence — Loss of IEEPA Exemptions:** Designation under E.O. 13224 and blocking under the GTSR means that standard IEEPA exemptions — for personal communications, humanitarian donations, information/informational materials, and travel — do *not* apply to transactions with the IRGC and its identified officials, agents, and affiliates (FAQ #534).

*Other Title I provisions (Sections 106, 107, 108) address arms embargo violations and human rights sanctions; these are primarily administered by the State Department rather than OFAC. OFAC's CAATSA page links only to the Section 105 FAQ and the October 31, 2017 GTSR amendment for Title I.*

## 3. Title II — Russia: Sections 221–243

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Title II, the Countering Russian Influence in Europe and Eurasia Act of 2017, is the broadest and most complex portion of CAATSA for purposes of OFAC implementation. It codified existing executive order-based Russia sanctions into statute, tightened sectoral sanctions, and introduced a suite of new secondary and menu-based sanctions authorities.

### Section 222: Codification of Executive Orders

Section 222 codified the sanctions imposed by E.O. 13660, E.O. 13661, E.O. 13662, and E.O. 13685 (the Ukraine-/Russia-related executive orders) into statutory law. This means the President may not terminate or waive those sanctions without prior congressional review under the procedures established in Title II.

## Section 223: Modification of E.O. 13662 Sectoral Sanctions

Section 223 directed OFAC to narrow the permissible debt terms in the existing sectoral sanctions Directives:

Directive	Pre-CAATSA Debt Limit	Post-CAATSA Debt Limit	Sector Covered
Directive 1	30 days	14 days	Russian financial institutions (SDN-listed)
Directive 2	90 days	60 days	Russian energy companies (SDN-listed)
Directive 4	N/A (new provision)	Effective Jan. 29, 2018	Russian deepwater, Arctic, shale oil projects

- **Section 223(a):** Does not *require* the imposition of new sanctions. OFAC clarified (FAQ #539) that Section 223(a) authorizes but does not mandate designation of additional Russian-economy sectors, stressing the importance of allied coordination.
- **Directives 1 and 2 (as amended September 29, 2017):** Reflect the tightened debt maturities. The SSI List continues to identify entities subject to Directives 1–4.
- **Directive 4 (as amended October 31, 2017):** Prohibits the provision of goods, services, or technology in support of Russian deepwater, Arctic offshore, or shale oil exploration or production for projects in which a Directive 4-listed entity has a 33% or greater interest. OFAC confirmed (Directive 4 FAQs) that Directive 4 does *not* apply to the provision of financial services, and that new restrictions from the October 31, 2017 amendment took effect January 29, 2018.

## Section 226: Russia-Linked Foreign Financial Institution Sanctions

Section 226 authorizes the President to impose sanctions on foreign financial institutions (FFIs) that knowingly facilitate significant transactions or provide significant financial services for persons sanctioned under E.O. 13661 (asset-freezing Russia EO) or E.O. 13662 (sectoral Russia EO). OFAC published specific FAQs on Section 226.

## Section 228: Sanctions Evaders and Human Rights Abusers

Section 228 imposes mandatory sanctions on persons who materially assist, sponsor, or provide financial, material, or technological support for, or goods and services to or in support of, persons designated under the Ukraine-/Russia-related executive orders, as well as on persons responsible for serious human rights abuses against individuals seeking to expose illegal activity by Russian government officials. OFAC published FAQs on Section 228.

## Section 231: Defense and Intelligence Sector Secondary Sanctions

Section 231 is the provision most significant for non-U.S. persons. It requires the President to impose at least five of the twelve sanctions described in Section 235 on any person who knowingly engages in a **significant transaction** with a person that is part of, or operates for or on behalf of, the **defense or intelligence sectors of the Government of the Russian Federation**.

- **The Section 231(d) List ("List of Specified Persons" / LSP):** The State Department published this list on October 27, 2017, identifying more than 80 individuals, entities, and government bodies associated with Russia's defense and intelligence sectors. Inclusion on the LSP does not itself constitute SDN status; the OFAC 50% rule does not automatically apply to LSP-listed entities that are not also on the SDN List.
- **Effective date:** The obligation to impose Section 235 sanctions on qualifying Section 231 violators took effect January 29, 2018.
- **"Significant transaction" standard:** Not defined by statute; determination is made case-by-case by the Secretary of State in consultation with the Secretary of the Treasury.
- **First enforcement actions:** In September 2018, the State Department sanctioned China's Equipment Development Department and its director for significant transactions with Rosoboronexport (ROE). In December 2020, OFAC sanctioned Turkey's Presidency of Defense Industries (SSB) for procurement of the S-400 missile system from ROE — the first application of CAATSA Section 231 against a NATO ally.

### **Section 232: Pipeline Sanctions**

Section 232 authorizes the President to impose sanctions on persons making investments that directly and significantly contribute to the enhancement of Russia's ability to construct energy export pipelines. This authority targets projects such as Nord Stream 2 and was a significant source of allied concern at enactment. OFAC published FAQs on Section 233 (related privatization provision) but not directly on Section 232.

### **Section 233: Privatization Sanctions**

Section 233 authorizes sanctions on persons who invest in or facilitate the privatization of state-owned assets of the Russian Federation in a manner that unjustly benefits Russian government officials or their family members. OFAC published specific FAQs on Section 233.

### **Section 234: Arms Transfers to Syria**

Section 234 authorizes sanctions on persons who transfer significant arms or related materiel to Syria with Russia's assistance. This is primarily a State Department authority.

## Section 235: The Sanctions Menu

Section 235 lists the twelve sanctions from which the President (or, per E.O. 13849, the Secretary of State in consultation with the Secretary of the Treasury) may select when imposing sanctions under applicable CAATSA provisions. At least five must be imposed when triggered by Section 231.

Sanction	Description
235(a)(1)	Ban on U.S. Export-Import Bank assistance for exports to the sanctioned person
235(a)(2)	Ban on U.S. export licenses and authorizations for items exported to the sanctioned person
235(a)(3)	Ban on U.S. financial institutions extending loans or credits exceeding \$10M in any 12-month period
235(a)(4)	U.S. opposition to loans by international financial institutions benefiting the sanctioned person
235(a)(5)	Ban on the sanctioned person serving as a primary dealer for U.S. government debt instruments
235(a)(6)	Ban on the sanctioned person serving as a U.S. government repository
235(a)(7)	Prohibition on transactions in foreign exchange subject to U.S. jurisdiction
235(a)(8)	Prohibition on banking transactions involving U.S. financial institutions
235(a)(9)	Full asset blocking (property and interests in property) — triggers SDN List placement
235(a)(10)	Prohibition on U.S. persons investing in or purchasing significant equity or debt of the sanctioned person
235(a)(11)	Exclusion of the sanctioned person's principal executive officers from the United States
235(a)(12)	Imposition of sanctions on the sanctioned person's principal executive officers

**Key point (FAQ #869):** Sanctions under Section 235(a)(1)–(8) and (10)–(11) are non-blocking ("menu-based") sanctions; OFAC's 50% Rule does not extend these non-blocking sanctions to entities 50%+ owned by the sanctioned person unless OFAC separately lists the owned entity. However, Section 235(a)(9) (asset blocking) does trigger SDN List placement and the 50% Rule applies in the normal manner.

## Section 241: Oligarchs Report

Section 241 required the Secretary of the Treasury (in coordination with State and DNI) to submit to Congress a report on senior political figures, oligarchs, and parastatal entities of the Russian Federation. Treasury delivered this report on January 29, 2018. OFAC clarified (FAQ #552) that the report is **not** a sanctions list and that inclusion does not, in and of itself, impose any restrictions or prohibitions. However, Treasury confirmed the report was being used to inform future targeted sanctions actions.

## 4. Title III — North Korea

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Title III expanded the North Korea Sanctions and Policy Enhancement Act of 2016 (NKSPEA) to cover additional sanctionable activities, including those related to precious metals, aviation, insurance services for North Korean vessels, and dealings with North Korean financial institutions. It also authorized secondary sanctions against persons providing significant economic or financial services to North Korea.

CAATSA-related North Korea provisions are fully incorporated into the North Korean Sanctions Regulations at **31 CFR Part 510**. All North Korea general licenses are codified within Part 510. OFAC does not maintain a separate CAATSA-North Korea regulatory part; the CAATSA page on OFAC's website links directly to the North Korea sanctions program page.

## 5. Executive Order 13849 (September 20, 2018)

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E.O. 13849, titled "Authorizing the Implementation of Certain Sanctions Set Forth in the Countering America's Adversaries Through Sanctions Act," is the key executive order for CAATSA implementation. Its principal functions:

- Delegated to the Secretary of State, in consultation with the Secretary of the Treasury, the authority to impose the menu-based sanctions described in Section 235 of CAATSA as needed to implement other CAATSA provisions (including Section 231).
- Established the authority to add persons to the SDN List (for asset-blocking sanctions under Section 235(a)(9)) or to the Non-SDN Menu-Based Sanctions (NS-MBS) List (for non-blocking sanctions under Section 235(a)(1)–(8) and (10)–(11)).
- Implemented the loan prohibition at Section 235(a)(3) through OFAC's administrative framework, with a \$10 million/12-month threshold.
- Was the subject of FAQ #627, which explains its purpose and scope.

## 6. CAATSA-Relevant Sanctions Lists

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### Specially Designated Nationals and Blocked Persons (SDN) List

SDN List entries for CAATSA-Russia designations carry the [CAATSA - RUSSIA] tag. Persons subject to asset-blocking under Section 235(a)(9) appear on the SDN List. All standard blocking consequences and the 50% Rule apply. SDN entries frequently also reflect secondary sanctions risk notices under 31 CFR 589.201.

### Sectoral Sanctions Identifications (SSI) List

The SSI List identifies persons determined to operate in sectors of the Russian economy identified by the Secretary of the Treasury under E.O. 13662. Transactions in new debt above the Directive-applicable maturity threshold, or covered services, are prohibited with SSI-listed persons under the applicable Directive. The SSI List is part of OFAC's Consolidated Sanctions List.

## Non-SDN Menu-Based Sanctions (NS-MBS) List

Introduced by OFAC on December 14, 2020 (simultaneously with the SSB/Turkey action), the NS-MBS List identifies persons subject to non-blocking CAATSA Section 235 sanctions as implemented by E.O. 13849, and also persons subject to sanctions under the Ukraine Freedom Support Act of 2014 (as amended by CAATSA) and the Protecting Europe's Energy Security Act (PEESA). The NS-MBS List is included in OFAC's Consolidated Sanctions List search tool.

**Critical distinction (FAQ #869):** *The OFAC 50% Rule does not automatically extend non-blocking NS-MBS List sanctions to entities 50%+ owned by a listed person. Only the blocking sanction (235(a)(9)) extends via the 50% Rule.*

## 7. Licensing Under CAATSA

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CAATSA does not have a standalone set of general licenses published outside the underlying program regulations. Licensing for CAATSA-sanctioned parties occurs through the following mechanisms:

### General Licenses within Program Regulations

All currently valid North Korea general licenses (including those implementing CAATSA Title III provisions) are incorporated into 31 CFR Part 510. Ukraine-/Russia-related general licenses are codified in 31 CFR Part 589 and published as standalone documents; as of 2022, numerous web general licenses (GLs 2, 10, 17–25 and later) were issued. Iran-related activities are governed by the applicable Iran program regulations, with CAATSA-specific consequences for IRGC-related entities noted above.

### Specific Licensing

Applications for specific licenses authorizing otherwise-prohibited transactions may be submitted through OFAC's online License Application Page. Standard licensing policies apply, including:

- **Legal Fees Guidance:** Guidance on the release of limited amounts of blocked funds for payment of legal fees and costs incurred in challenging SDN blocking — applicable to CAATSA-blocked persons.
- **50% Rule Entities:** OFAC guidance on entities owned by blocked persons applies fully to CAATSA-blocked SDN-listed persons.

### Section 236: Exceptions, Waivers, and Termination

Section 236 of CAATSA provides the President with authority to waive sanctions imposed under Title II (Russia) on a case-by-case basis if the President certifies to Congress that the waiver is in the national security interest of the United States. Section 237 provides a specific exception for NASA and space-related activities.

## 8. Key FAQs and Official Guidance Documents

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The following FAQs are published on OFAC's CAATSA page or linked from the Russia, Iran, and North Korea program pages as CAATSA-specific:

### *Title I (Iran)*

- **FAQ #533:** CAATSA Section 105 — IRGC designation requirements and implementation

- **FAQ #534:** Consequences of IRGC designation under E.O. 13224 / GTSR, including loss of IEEPA exemptions

## ***Title II (Russia)***

- **Section 223(a) FAQs:** Scope and discretionary nature of authority to expand sectoral sanctions
- **Sections 223(b)/(c) FAQs:** Implementation of Directives 1, 2, and 4 modifications
- **Section 226 FAQs:** FFI sanctions for transactions with E.O. 13661/13662 designated persons
- **Section 228 FAQs:** Mandatory sanctions on sanctions evaders and human rights abusers
- **Section 233 FAQs:** Privatization sanctions scope
- **Section 235 FAQs:** The sanctions menu; selection criteria; blocking vs. non-blocking
- **Directive 4 FAQs:** Deepwater/Arctic/shale oil prohibitions, effective date, scope
- **FAQ #539:** Section 223(a) does not require sanctions; importance of allied coordination
- **FAQ #552:** Section 241 oligarchs report is not a sanctions list
- **FAQ #627:** Purpose and scope of E.O. 13849
- **FAQ #869:** NS-MBS List and 50% Rule — non-blocking sanctions do not extend via ownership
- **FAQ #870:** Section 235(a)(3) loan prohibition — \$10M/12-month threshold

## **Key Guidance Documents**

- **Amendment of Global Terrorism Sanctions Regulations (October 31, 2017):** Implements Section 105 IRGC-affiliate blocking — listed on OFAC's CAATSA page under Title I.
- **Ukraine-/Russia-related Directives 1, 2, and 4 (as amended September 29 and October 31, 2017):** The operative sectoral sanctions documents — listed on OFAC's CAATSA page under Title II.
- **Publication of Ukraine-/Russia-related CAATSA Guidance (October 31, 2017):** OFAC action releasing amended Directive 4 and initial CAATSA FAQs.
- **Section 241 Oligarchs Report (January 29, 2018):** Submitted to Congress; Treasury clarified it is not a sanctions list.
- **Guidance on Provision of Certain Services Relating to U.S. Sanctions Laws (January 12, 2017):** Referenced on both the Ukraine-/Russia and North Korea pages.
- **FACT SHEET: Russia Sanctions and Agricultural Trade (July 2022):** Published on the Ukraine-/Russia-related sanctions page; addresses agricultural carve-outs.

## **9. Compliance Considerations for Practitioners**

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### **Screening**

- Screen against all OFAC lists: SDN, SSI, NS-MBS, and OFAC's Consolidated Sanctions List. CAATSA-tagged entries ([CAATSA - RUSSIA]) appear within the SDN List data file.
- For Russia-related transactions, also check the State Department's Section 231(d) List ("List of Specified Persons") for potential secondary sanctions exposure.
- Note that NS-MBS List entries include specific Section 235 sanctions applied; review which sanctions apply to a particular listed person before determining whether a contemplated transaction is prohibited.

## Secondary Sanctions Exposure (Non-U.S. Persons)

- Non-U.S. persons who knowingly engage in significant transactions with Russia's defense or intelligence sector (Section 231) or who facilitate transactions for persons subject to the Ukraine-/Russia-related EOs (Section 226) face secondary sanctions exposure.
- The "significant transaction" standard is not defined by statute; any substantial transaction with LSP-listed entities should be evaluated for CAATSA Section 231 risk.
- Designation under Section 231/235 does not necessarily mean SDN-List placement; non-blocking sanctions can be imposed, with consequences targeted and limited to the specific Section 235 measures selected.

## Staying Current

OFAC continues to make CAATSA-Russia designations on a regular basis (as recently as February 2026), often in tandem with cyber-related designation actions. Subscribe to OFAC's CAATSA-specific email updates for timely notice of new actions.

## 10. Official Document Index

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### Legislation

- Countering America's Adversaries Through Sanctions Act (CAATSA), P.L. 115-44 (Aug. 2, 2017)
- Support for the Sovereignty, Integrity, Democracy, and Economic Stability of Ukraine Act of 2014 (SSIDES)
- North Korea Sanctions and Policy Enhancement Act of 2016 (NKSPEA)
- International Emergency Economic Powers Act (IEEPA), 50 U.S.C. §§ 1701–1706
- National Emergencies Act (NEA), 50 U.S.C. §§ 1601–1651

### Executive Orders

- E.O. 13849 — Authorizing the Implementation of Certain Sanctions Set Forth in CAATSA (Sept. 20, 2018)
- E.O. 13660, 13661, 13662, 13685 — Ukraine-/Russia-related EOs (codified by CAATSA Section 222)
- E.O. 13224 — Global Terrorism (used to designate IRGC under CAATSA Section 105)

### Regulations (CFR)

- 31 CFR Part 589 — Ukraine-/Russia-Related Sanctions Regulations
- 31 CFR Part 510 — North Korea Sanctions Regulations (includes all CAATSA Title III general licenses)
- 31 CFR Part 594 — Global Terrorism Sanctions Regulations (amended Oct. 31, 2017 per CAATSA Section 105)

### Directives and Key Guidance

- Ukraine-/Russia-related Directive 1 (as amended Sept. 29, 2017)
- Ukraine-/Russia-related Directive 2 (as amended Sept. 29, 2017)
- Ukraine-/Russia-related Directive 4 (as amended Oct. 31, 2017)

- Amendment of Global Terrorism Sanctions Regulations (Oct. 31, 2017)
- State Department Section 231(d) List / List of Specified Persons (Oct. 27, 2017; updated periodically)
- Section 241 Report on Oligarchs and Parastatal Entities (Jan. 29, 2018)

## **Sanctions Lists**

- SDN List (Specially Designated Nationals and Blocked Persons) — includes [CAATSA - RUSSIA] tagged entries
- Sectoral Sanctions Identifications (SSI) List — identifies persons under E.O. 13662 Directives
- Non-SDN Menu-Based Sanctions (NS-MBS) List — non-blocking CAATSA Section 235 sanctions (introduced Dec. 14, 2020)
- Consolidated Sanctions List — searchable tool that includes SDN, SSI, and NS-MBS

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*This guide is a reference summary prepared for sanctions compliance professionals. It is not legal advice. Always verify current sanctions programs, lists, and guidance at [ofac.treasury.gov](https://ofac.treasury.gov) before making compliance decisions. May 2026.*