



Updated January 11, 2018

## Countering America's Adversaries Through Sanctions Act (CAATS Act) Deadlines, Time Frames, and Start Dates

The Countering America's Adversaries Through Sanctions Act (CAATS Act; P.L. 115-44, signed into law August 2, 2017) requires a number of actions or reports of the executive branch within a specific timeframe, by a deadline, or starting from a specific date. The CAATS Act has three titles, each dedicated to a particular U.S. economic sanctions regime: Title I, Countering Iran's Destabilizing Activities Act of 2017; Title II, Countering Russian Influence in Europe and Eurasia Act of 2017; and Title III, Korean Interdiction and Modernization of Sanctions Act.

The act also creates new authorities or amends existing authorities for the President to impose economic sanctions at his discretion or based on his determinations and certifications; see CRS In Focus IF10694, *Countering America's Adversaries Through Sanctions Act*.

### Action Due By September 1, 2017 (30 days)

- Section 225 – Requires President, on or after this date, to impose Ukraine Freedom Support Act (UFSA)-defined sanctions on any “foreign person [who] knowingly makes a significant investment in a special Russian crude oil project,” unless he determines that it is not in the national interest (previously discretionary).
- Section 226(2) – Requires President, on or after this date, to impose restrictions on any foreign financial institution that facilitates transactions for any Russian Specially Designated National (SDN) unless he determines that it is not in the national interest (previously discretionary).

### Action Due By October 1, 2017 (60 days)

- Section 223 – Modify Directives 1 and 2 to Executive Order 13662, pertaining to length of maturity for certain short-term debt, targeting Russia entities for Ukraine-related activities (Secretary of the Treasury).
- Section 224 – Requires President, on or after this date, to issue sanctions—based on International Emergency Economic Powers Act (IEEPA) authorities, or defined in Section 235 of the Act or Section 4 of the UFSA—targeting Russia's illicit cyber activities.
- Section 231 – President issues regulations or other guidance to define “persons that are part of, or operate for or on behalf of, the defense and intelligence sectors” of the Russian government, in anticipation of sanctions required at 180 days (January 29, 2018).

### Action Due By October 31, 2017 (90 days)

- Section 105 – President imposes IEEPA-based sanctions on Iran Revolutionary Guard Corps (IRGC) and foreign persons that are IRGC affiliates, officials, or agents.

- Section 106(a) – State Department identifies persons responsible for extrajudicial killings, torture, other human rights violations against Iranian whistleblowers, human rights defenders, or their supporters (annually thereafter).
- Section 110 – Report on U.S. citizens held by Iran or groups supported by Iran, and U.S. efforts to secure their release (President; unclassified, classified) (every 180 days thereafter).
- Section 223 – Modify Directive 4 to Executive Order 13662, affecting exports allowed for oil exploration in Russia (Secretary of the Treasury).
- Section 255 – Report on media organizations controlled or owned by Russian government (President; unclassified, classified) (ends August 2, 2022).
- Section 256 – Report on funds provided by Russian Russia to influence elections in Europe or Eurasia (President; unclassified, classified) (ends August 2, 2022).
- Section 324 – Secretary of State reports on “whether North Korea meets the criteria for designation as a state sponsor of terrorism” (unclassified, classified).

### Action Due By January 29, 2018 (180 days minus 10 days)

- Section 333 – President notifies Congress not fewer than 10 days prior to issuing regulations to implement the North Korea title.

### Action Due By January 29, 2018 (180 days)

- Section 103 – Regional strategy for deterring conventional and asymmetric Iranian activities and threats (State, Defense, the Treasury, Director of National Intelligence (DNI); unclassified, classified) (every two years thereafter).
- Section 104 – Report on persons contributing to Iran's ballistic missile program in previous 180 days (President; unclassified, classified) (every 180 days thereafter).
- Section 109 – Report on US-EU coordination on Iran-related sanctions over previous 180 days (President; unclassified, classified) (every 180 days thereafter).
- Section 231 – President, on and after this date, imposes Section 235 sanctions on those engaging in a significant transaction with a person who is part of, or operates for or on behalf of, Russia's defense or intelligence sector. President may waive application with certification every 180 days “that the person is substantially reducing the number of significant transactions.”

- Section 241 – Report on Russian oligarchs and parastatals, U.S. economic exposure to such persons, effects of restrictions on debt and equity, potential impact of secondary sanctions (Secretary of the Treasury, with State, DNI; unclassified, classified).
  - Section 242 – Report on expanding Russian sanctions to include sovereign debt and derivative products (Secretary of the Treasury, with State, DNI; unclassified, classified).
  - Section 257 – Report on assisting Ukraine in its energy crisis in Ukraine, provided in Section 7(c) of UFSA, with specific reporting on emergency energy assistance funding (Secretary of State) (every 180 days thereafter; congressional briefings 30 days after report; ends August 2, 2022).
  - Section 273 – Report on Treasury’s financial attachés and technical assistance advisors in U.S. embassies—their work on terrorist financing, money laundering, proliferation financing (Secretary of the Treasury).
  - Section 311 – President reports on whether there are “reasonable grounds” to designate six specific entities, individuals, and their affiliates as SDN for their North Korea activities as defined in the North Korea Sanctions and Policy Enhancement Act of 2016 (NKSPEA; P.L. 114-122) (unclassified, classified).
  - Section 313 (amending §203, NKSPEA) – Report on compliance of foreign countries to curtail arms trafficking involving North Korea (Secretary of State; unclassified, classified) (annually thereafter for five years).
  - Section 314 (amending §205, NKSPEA) – Report on foreign sea ports and airports that fail to implement U.N. Security Council resolutions (UNSCR) relating to inspection of cargo to/from North Korea, with details on specific ports in China, Iran, Russia, and Syria. (President; unclassified, classified) (annually thereafter for five years).
  - Section 315 (amending the Ports and Waterways Safety Act at 33 U.S.C. 1232c) – Report identifying foreign vessels over 300 gross tons owned or operated by or on behalf of the government of North Korea or a DPRK person, an entity identified by the Section 205, NKSPEA report, or a foreign government that does not comply with relevant UNSCR (Secretary overseeing Coast Guard; published with periodic updates).
  - Section 316 – President reports on North Korea-Iran cooperation on ballistic missiles, chemical or biological weapons, or conventional weapons programs, including names of other foreign nationals that facilitate this cooperation, and the relationship to UNSCR requirements (unclassified, classified; annually thereafter for five years).
  - Section 317 – President reports on others’ efforts to comply with DPRK-related UNSCR (unclassified, classified; annually thereafter for five years).
  - Section 318 – President briefs on international use of specialized financial messaging services available to DPRK financial institutions (may be classified; every 180 days thereafter for five years).
  - Section 333 – Regulations to implement the North Korea title. Not fewer than 10 days prior to issuing the regulations, President shall notify and provide the proposed regulations to the appropriate congressional committees.
- Action Due By April 1, 2018 (explicit in legislation)**
- Section 254 – Report on programs and activities carried out under the Countering Russian Influence Fund. Report on funding provided to certain countries by the European Union, EU and NATO countries, and international organizations and “quasi-governmental funding entities” (Secretary of State, through Coordinator of U.S. Assistance to Europe and Eurasia) (every April 1 thereafter; terminates August 2, 2022).
- Action Due By April 29, 2018 (270 days)**
- Section 271 – Report on pilot project for Somali money transfers, addressing cross-border fund transfers and other tools used in illicit finance activities (Secretary of the Treasury).
- Action Due By August 2, 2018 (one year)**
- Section 243 – Report on illicit finance (e.g., terrorism, narcotics, proliferation, money laundering) relating to Russia (Secretary of the Treasury, with Attorney General, DNI, Homeland Security, State; unclassified, classified) (annually through 2021).
  - Section 261 – Strategy for combatting terrorism financing and related forms of illicit finance (President, through the Secretary of the Treasury, with Attorney General, State, Homeland Security, DNI, Office of Management and Budget, and Federal financing agencies and regulators; unclassified, classified) (updates January 31, 2020; January 31, 2022).
- Action Due By January 31, 2020**
- Section 261 – First update of national strategy for combatting the financing of terrorism and related forms of illicit finance (see August 2, 2018).
- Action Due By January 31, 2022**
- Section 261 – Second update of national strategy for combatting the financing of terrorism and related forms of illicit finance (see August 2, 2018).
- Action Due By August 2, 2022 (five years)**
- Section 108 – Review of Iran-related designations on the Department of the Treasury’s Office of Foreign Assets Control (OFAC) SDN list to determine role in Iran’s international terrorism or ballistic missile program, and apply appropriate sanctions (President).

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