October 13, 2026

Mr. Omar Abbosh
Pearson Education, Inc.
330 Hudson St, Floor 9
New York, NY 10013

Dear Mr. Abbosh,

We write with deep concern regarding apparent overcompliance by Pearson with U.S. sanctions that has led your institution to bar Iranian nationals from utilizing your services, including the PTE Academic examination. Our organization, the National Iranian American Council (NIAC), has a long history of tracking changes to U.S. sanctions policy and their implementation.

There are reports that individuals of Iranian background from all parts of the world have received denial of service notices from Pearson as a result of the changes in U.S. sanctions regulations. However, there is no legal requirement for Pearson or other institutions to bar Iranian nationals not in Iran or ordinarily resident in Iran from accessing academic services provided by Pearson, notwithstanding the recent suspension of Iran General License G by the U.S. Treasury Department.

Despite this, Pearson has engaged in a major effort to bar individuals of Iranian heritage from its services, including those not ordinarily resident in Iran. Our organization has received extensive documentation supporting this conclusion. While Pearson has implemented an "Identification Exception Request Form", reports indicate this restoration process is onerous, problematic and uncertain. Pearson has, strangely, directed individuals with an Iranian passport to select "I am a refugee or stateless person," when submitting their documentation. While some in the Iranian diaspora may fit that categorization, using it to process the vast majority of Iranian nationals suggests a failure within Pearson to treat Iranian nationals inside and outside of Iran as human beings with full agency and rights.

Moreover, Pearson has failed to review documents from individuals of Iranian heritage seeking to verify they are ordinarily resident outside of Iran and restore their ability to take tests with Pearson in a timely manner. Instead, individuals receive no answer even as their test dates come and go, or are rejected with little explanation despite having submitted proof of residency. As one impacted individual described to us, Pearson's "nominal residency review functions more as a barrier than a genuine due process mechanism."

These reports are deeply concerning, and strongly suggest that Pearson is engaging in an overcompliance of sanctions that is unnecessary, punitive and discriminatory. As a result, it is likely contrary to vital legal protections against discrimination in both the United States and other nations where Pearson administers tests. We strongly urge you to revisit this policy and take effective and immediate remedial action. This includes immediately restoring services and test dates for individuals of Iranian heritage not ordinarily resident in Iran, expeditiously reviewing and approving eligible individuals who have submitted required documentation, eliminating the processing of Iranians solely through a refugee or stateless person category and - to the extent necessary - seeking a license from the Office of Foreign Assets Control at the Treasury Department allowing Pearson to fully restore services to all impacted Iranian nationals.

NIAC welcomes the opportunity for dialogue with Pearson to discuss sanctions compliance, the impact of Pearson's changes on individuals of Iranian nationals and the urgent need for remedial action.

Sincerely,



Jamal Abdi
President, NIAC