

IMPORTANT UPDATE

On January 16, 2015, the Office of Foreign Assets Control (OFAC) published new regulations concerning the Cuba sanctions program. Under these new regulations, financial restrictions have been eased and more educational and research activities fall under a general license. However, unless and until the U.S. Congress repeals the embargo, trade and travel restrictions remain in place, and Penn-related Cuba travel will still require general authorization. Please be aware that until U.S. financial institutions are willing to support financial transactions in Cuba and with the Cuban government, it will not be possible to use debit and credit cards while in Cuba; until the Cuban Consular Section is able to access a bank to manage financial transactions in the U.S., it will be difficult for U.S. travelers to obtain Cuban visas. We will update this guidance document as new information becomes available. Please contact the Global Support Services Office for more information and assistance.

Travel to Cuba by U.S. citizens and residents is generally restricted because of the U.S. embargo on trade with Cuba. However, restrictions on travel for education and academic research were eased in January 2011, and updated in January 2015. This document provides general guidance to the Penn community for Cuba travel. Penn travelers should be mindful that the OFAC regulations are subject to change, so specific requirements should be checked prior to departure. Those interested in traveling to Cuba are also referred to the OFAC Cuba sanctions website (<http://www.treasury.gov/resource-center/sanctions/Programs/Pages/cuba.aspx>) for complete information.

Cuba Travel Eligible for University of Pennsylvania Sponsorship

The following activities may be sponsored by Penn and conducted under a General License available to accredited U.S. undergraduate and graduate degree granting academic institutions:

- Educational travel program in Cuba as part of a course offered for credit at Penn
- Student travel to Cuba for non-commercial academic research specifically related to Cuba and for the purposes of obtaining an undergraduate or graduate degree at Penn (**NEW!** This now applies to undergraduate academic research)
- Participation in a formal course of study at a Cuban academic institution where the completed coursework will be accepted for credit toward the student's degree by Penn (For undergraduate students, this activity is administered through the Office of International Programs. Please see <http://www.upenn.edu/oip> for application information)
- Penn faculty travel to Cuba to teach at a Cuban academic institution related to an academic program at the Cuban institution, provided that the faculty member remains employed by Penn for the travel period (**NEW!** The 10-week mandatory teaching duration no longer applies)
- Travel to Cuba by Penn faculty and staff that may be required for organization of and preparation for any of these activities may also be sponsored by Penn

While no longer required by OFAC regulations, Penn faculty, staff, and students traveling to Cuba under University of Pennsylvania sponsorship should carry an appropriate authorization letter printed on University letterhead and signed by the designated representative for Penn. Please contact expctrl@lists.upenn.edu or 215-573-8817 for assistance in obtaining the required letter.

Travel to Cuba for Professional Research and Professional Meetings

Penn faculty or graduate students wishing to travel to Cuba to attend professional meetings or to engage in research activities may be able to do so under a General License. In order for such activities to meet the requirements for this general license, the following conditions must be met (**NEW!**):

Professional research is authorized provided that:

- The research directly relates to the traveler's profession, professional background, or area of expertise, including area of graduate-level, full-time study;
- Is not in pursuit of a hobby, tourism, recreational travel, or research for personal satisfaction only;
- Comprise a full-time work schedule in Cuba; and
- The traveler's schedule of activities does not include free time or recreation in excess of that consistent with a full-time schedule of professional research.

Professional meetings and conferences are authorized provided that:

- They are not promoting tourism in Cuba;
- Are directly related to the traveler's profession, professional background, or area of expertise, including graduate-level full-time study;
- The traveler does not engage in recreational travel, tourist travel, or travel in pursuit of a hobby; and
- The traveler's schedule of activities does not include free time or recreation in excess of that consistent with a full-time schedule of attendance at professional meetings and conferences.

Information Applicable to All Authorized Cuba Travel

NEW! OFAC has established a General License authorizing U.S. airlines to provide travel services to Cuba; however, it may be some time before it will be easy to arrange travel. Please contact the Global Support Services Office for guidance on arranging Penn-related Cuba travel.

NEW! There is no per diem limitation on authorized travelers' spending in Cuba, and authorized travelers may now bring back no more than \$400 worth of goods from Cuba (including up to \$100 in alcohol or tobacco products).

NEW! The Department of Commerce issued an amendment to the Export Administration Regulations (EAR), creating a new license exception SCP (Support of the Cuban People), which authorizes the temporary export of certain items for use in professional research and educational activities. Penn-owned equipment, including laptop computers, digital cameras, or cell phones may be taken to Cuba under this exception; however, the items should be accompanied by a Penn letter of ownership, need to be kept under the control of the traveler while in Cuba, and must be brought back to the United States. If traveling with export-controlled technology or material, a specific license may be required. It may take up to 2 months to obtain a license. Please contact the Export Compliance Office (expctrl@lists.upenn.edu) if you need additional information or to obtain a license to carry Penn owned equipment to Cuba.

Items that are personally owned by the traveler may be taken to Cuba as long as they do not contain export-controlled technology.

All records of transactions related to Cuba travel must be retained for 5 years after the completion of the travel.

Additional Considerations

The above information is to ensure compliance with the U.S. Cuban Assets Control Regulations administered by OFAC. In addition to meeting these requirements, travelers to Cuba must meet all applicable visa requirements imposed by the Cuban Government. Generally, educational travel must be approved or arranged through an agency authorized by the Cuban Government or sponsored by a Cuban institution, such as the University of Havana. Professional research must similarly be sponsored by a Cuban institution. It is important to recognize that sponsoring organizations in Cuba will have their own processes for approval, and that it may take several weeks or months for a proposed activity to be approved by the sponsor.

Information on Cuba travel visas may be obtained by calling the Cuba Interests Section in Washington, DC. Phone calls to the Academic Visa Section should be directed to 202-797-8518 ext 123 or via US mail by at: 2630 16th Street NW, Washington, DC 20009.