Guidance On University-Authorized Travel to Cuba

The Office of Foreign Assets Control (OFAC) oversees a wide range of regulations governing relationships with Cuba, including travel into the country, financial transactions, and related transactions. Effective June 2019, these regulations were amended to place restrictions upon some of the travel previously authorized under a general license. While it is generally understood that these changes have had little to no impact on the development of educational conferences and attendance of conferences in Cuba, University individuals must be mindful of them and their potential impact on other activities.

To meet the qualifications under OFAC, the Cuba travel must be under the auspices of Northwestern University and be related to:

- Participation in a Northwestern-sponsored structured educational program in Cuba as part of a course offered for credit. The program must be a full term, and must include a minimum of 10 weeks in Cuba if the traveler is not accompanied by a Northwestern employee.
- Noncommercial academic research in Cuba specifically related to Cuba and for the purpose of obtaining an undergraduate (but only when accompanied by a Northwestern employee) or graduate degree. The research in Cuba must be accepted for credit towards that degree.
- Participation in a formal course of study at a Cuban academic institution, provided the formal course of study in Cuba will be accepted for credit toward the student’s graduate or undergraduate degree and provided that the course of study is no shorter than 10 weeks in duration if the traveler is not accompanied by a Northwestern employee.
- Teaching at a Cuban academic institution by an individual regularly employed in a teaching capacity at Northwestern University, provided the teaching activities are related to an academic program at the Cuban institution.
- Sponsorship of a Cuban scholar to teach or engage in other scholarly activity at Northwestern University (in addition to those transactions authorized by the general license contained in § 515.571).
- Educational exchanges sponsored by Cuban or U.S. secondary schools involving secondary school students’ participation in a formal course of study or in a structured educational program offered by a secondary school or other academic institution and led by a teacher or other secondary school official. This includes participation by a reasonable number of adult chaperones to accompany the secondary school students to Cuba.
- Sponsorship or co-sponsorship of noncommercial academic seminars, conferences, symposia, and workshops related to Cuba or global issues involving Cuba, and attendance at such events by faculty, staff, and students of a participating U.S. academic institution.
- Establishment of academic exchanges (on behalf of Northwestern University) and joint non-commercial academic research projects with universities or academic institutions in Cuba.
- Provision of standardized testing services, including professional certificate examinations, university entrance examinations, and language examinations, and related preparatory services for such exams, to Cuban nationals, wherever located.
- Provision of internet-based courses, including distance-learning and Massive Open Online Courses, to Cuban nationals, wherever located, provided that the course content is at the undergraduate level or below.
- The organization of, and preparation for, activities described in the above by employees of Northwestern University.
- Facilitation by an organization that is a person subject to U.S. jurisdiction, or a member of the staff of such an organization, of licensed educational activities in Cuba on behalf of Northwestern University, provided that: (1) the organization is directly affiliated with Northwestern University; and (2) the organization facilitates educational activities that meet the requirements of one or more of the general licenses set forth in §515.565(a)(1)(i) through (iii), (a)(2)(i) through (iii), and (a)(2)(vi).
In addition to the above, travel to Cuba may be authorized for professional research or meetings when certain specific requirements are met.

In addition to the specific requirements outlined above for travel to Cuba, there are a number of restricted entities published by the U.S. State Department. Any transaction with these listed entities should be avoided. See: https://www.state.gov/cuba-sanctions/cuba-restricted-list/

Please note that all of the above require additional factors and considerations to meet the requirements of the license. Additional factors may include time duration minimums, required accompaniment by a Northwestern University representative, and a verification and authorization letter. OFAC provides updated FAQs at its website, https://www.treasury.gov/resource-center/sanctions/Programs/Documents/cuba_faqs_new.pdf

If you have any questions regarding this update, please contact the Office of Global Safety & Security and/or the Office for Export Controls Compliance.