

**IV. PROFESSIONAL RESEARCH & PROFESSIONAL MEETINGS – 31 C.F.R. § 515.564**

**General license for certain professional research and attendance at certain meetings or conferences - 31 C.F.R. § 515.564(a):**

Section 515.564(a) sets forth general licenses authorizing certain travel-related and additional transactions that are directly incident to full-time professionals conducting professional research in Cuba, attending certain international professional organization meetings or conferences in Cuba, and attending certain professional meetings related to the provision of telecommunications services.

Research requires a full work schedule of noncommercial, academic research that has a substantial likelihood of public dissemination and is in the traveler's professional area.

Example 1: An international professional association of jurists headquartered in England organizes an annual training conference. This year the conference will be held in Cuba. The prior venues for this conference have included locations in Spain, China, and Mexico. The general license is applicable to individuals who are full-time professionals.

Example 2: A university professor with a specialty in plant disease wishes to conduct a full-time schedule of non-commercial research in Cuba because his background research indicates that Cuba may have a plant strain that is resistant to disease. He plans to disseminate his findings in scholarly articles.

## **V. EDUCATIONAL ACTIVITIES - 31 C.F.R. § 515.565**

### **General license for certain educational activities of accredited U.S. graduate or undergraduate academic institutions – 31 C.F.R. § 515.565(a):**

Section 515.565(a) sets forth a general license authorizing accredited U.S. graduate and undergraduate degree-granting academic institutions, including faculty, staff, and students of such institutions, to engage in travel-related transactions and such additional transactions that are directly incident to:

- (a)(1) Participation in a structured educational program in Cuba as part of a course offered for credit by the sponsoring U.S. academic institution;
- (a)(2) Noncommercial academic research in Cuba specifically related to Cuba and for the purpose of obtaining a graduate degree;
- (a)(3) 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;
- (a)(4) Teaching at a Cuban academic institution by an individual regularly employed in a teaching capacity at the sponsoring U.S. academic institution, provided the teaching activities are related to an academic program at the Cuban institution and provided the duration of the teaching will be no shorter than 10 weeks;
- (a)(5) Sponsorship, including the payment of a stipend or salary, of a Cuban scholar to teach or engage in other scholarly activity at the sponsoring U.S. academic institution; or
- (a)(6) The organization of, and preparation for, activities described in (a)(1)-(5) above by members of the faculty and staff of the sponsoring U.S. academic institution.

General licenses constitute blanket authorization for those transactions set forth in the relevant regulation. For persons satisfying all criteria and conditions in a general license, no further permission from OFAC is required to engage in transactions authorized by that general license. Each person engaging in transactions, including travel-related transactions, under a general license must be able to document how he or she qualifies under the general license.

**Note:** It is a requirement of the general license that travelers to Cuba authorized pursuant to this provision carry letters on official letterhead signed by a designated representative of the sponsoring academic institution (defined as a person designated by the relevant dean or the academic vice-president, provost, or president of the institution as the official responsible for overseeing the institution's Cuba travel program). Please refer to the relevant subsection within section 515.565(a) for more specific information concerning the necessary contents of such letters. In addition, U.S. academic institutions and individual travelers must retain records related to the transactions authorized pursuant to this provision. *See* 31 C.F.R. §§ 501.601 and 501.602.

The general license authorizes all members of the faculty and staff (including but not limited to adjunct faculty and part-time staff) of the sponsoring U.S. academic institution to participate in the activities

set forth in the general license. A student currently enrolled in a graduate or undergraduate degree program at any accredited U.S. academic institution is authorized pursuant to the general license to participate in the academic activities in Cuba set forth in the general license through any sponsoring U.S. academic institution, not only through the institution at which the student is pursuing a degree.

Full-time professionals who wish to engage in travel-related transactions to conduct professional research or attend professional meetings in Cuba are not authorized by this general license and must qualify under the general license contained in section 515.564(a) or obtain a specific license under section 515.564(b).

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