

Export Controls Update

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Travel to Cuba

- Since the last update in February 2015, a number of things have changed.
 1. Cuba is no longer considered a State Sponsor of Terrorism.
 2. Diplomatic relations between the US and Cuba were reestablished on July 20, 2015.
- However, to visit Cuba, an individual must either fall within the 12 categories of authorized travel (the general license) OR obtain a specific license (case-by-case determination that requires submitting an application to the Office of Foreign Assets Control (OFAC)).
- The authorization also allows for some travel related transactions that previously required a specific license.
- OFAC has published FAQs about this at:
http://www.treasury.gov/resource-center/sanctions/Programs/Documents/cuba_faqs_new.pdf

12 Categories of Authorized Travel:

1. family visits
2. official business of the U.S. government, foreign governments, and certain intergovernmental
3. organizations
4. journalistic activity
5. professional research and professional meetings
6. educational activities
7. religious activities
8. public performances, clinics, workshops, athletic and other competitions, and exhibitions
9. support for the Cuban people
10. humanitarian projects
11. activities of private foundations or research or educational institutes
12. exportation, importation, or transmission of information or information materials

Iran Update

- At a recent university export control meeting in Washington DC, an OFAC official publicly stated that an OFAC license IS required for faculty attending and/or presenting at conferences in Iran.
- Conference attendees/presenters may be considered to be receiving and/or providing a “service.” These “services” may require licensing under the Iranian Transactions Regulations (31 C.F.R. Part 560).
- The need for a license will be determined on a case-by-case basis. Note that OFAC takes a very long time to process these requests.