

Export Controls Update

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UNITED



Traveling
to Cuba?

Please proceed to the
check-in counter
located on LEVEL 2,
DOOR 5 for check-in

STAR ALLIANCE 

Travel to Cuba

- A number of things have changed in the past year:
 1. Cuba is no longer considered a State Sponsor of Terrorism.
 2. Diplomatic relations between the US and Cuba have been reestablished.
- 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

Categories of Authorized Travel:

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

*categories most frequently used at UCLA

Revised rules for “people to people” educational activities

- Travelers utilizing this general license must ensure they maintain “a full-time schedule of educational exchange activities intended to enhance contact with the Cuban people.”
- Previously, people to people activities had to be organized and conducted by companies licensed to do so by OFAC.
- Now, individuals and organizations not specifically licensed by OFAC can organize such activities and travel under the general license.
- However, they must retain records documenting all authorized travel transactions, including records demonstrating a full time schedule of authorized activities.
- At UCLA, this license has been used for travelers who do not have the specific academic credentials that would qualify them for the professional research or the other educational activities categories.

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.
- In addition, any travel to Iran for research purposes normally requires an OFAC license.

This is what a researcher sent my colleague when she let him know his OFAC license to travel to Iran was approved.

<https://youtu.be/IUZEtVbJT5c>