

Cuba in Context: Regulations and Realities

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- Use the chatbox to tell us what college, university, or organization you're with and how many people are watching with you.
- Questions will be accepted via the chat box.
- A recorded version of this presentation will be available on the NAFSA website.

Cuba in Context: Regulations and Realities

Today's Speakers:

Scott Douglass, Sanctions Licensing Officer, Office of Foreign Assets Control, U.S. Department of the Treasury

Laura Boudon, PhD, Director of Study Abroad, Florida International University

Annie Gibson, PhD, Associate Director for Intercultural Learning, Tulane University

Allison Cash Spiro, Associate Director for Education Abroad Services, NAFSA: Association of International Educators

Acronyms

- OFAC = Office of Foreign Assets Control (U.S. Dept. of Treasury)
- CACR = Cuban Assets Control Regulations
- GL = General License
- SOE = State Owned Enterprise

Today's Agenda:

- NAFSA: Cuba Engagement Initiative
- OFAC: Key Regulations Impacting Education Abroad
- Florida International University and Tulane University: Realities on the Ground
- Q&A
- Wrap up

Historic Change

“The Cuba you know today isn’t the same Cuba as yesterday or tomorrow”

TMZ NEWS SPORTS VIDEOS PHOTOS CELEBS

Home → Madonna's Still a Material Girl, Even At Cuba's Bargain Rates

MADONNA Still a Material Girl ... EVEN AT CUBA'S BARGAIN RATES

f 347 t 639 8/17/2016 4:09 PM PDT BY TMZ STAFF

EXCLUSIVE DETAILS

First US cruise ship in decades arrives in Cuba

2 May 2016 | Latin America & Caribbean



Cubans welcomed the arrival of the Adonia, the first cruise ship in more than 50 years to sail from Miami

khloekardashian • 5 months ago + Follow



Pablo was here! Cuba cu

565.3k likes 4,687 comments

Instagram

PEOPLE exclusively reported on Tuesday, that members of the famous family were heading to Cuba with cameras in tow where they'll document the trip for the latest season of *Keeping Up with the Kardashians*.

USA TODAY NEWS SPORTS LIFE MONEY TECH TRAVEL OPINION 73° CROSSWORDS ELECTIONS 2016

Booking a flight to Cuba? Here's what to expect now

NAFSA Initiatives

- NAFSA Cuba Engagement Initiative

Visit www.nafsa.org/cubaengagement

- Join the Cuba Engagement Network

- NAFSA Public Policy

Visit www.nafsa.org/cuba

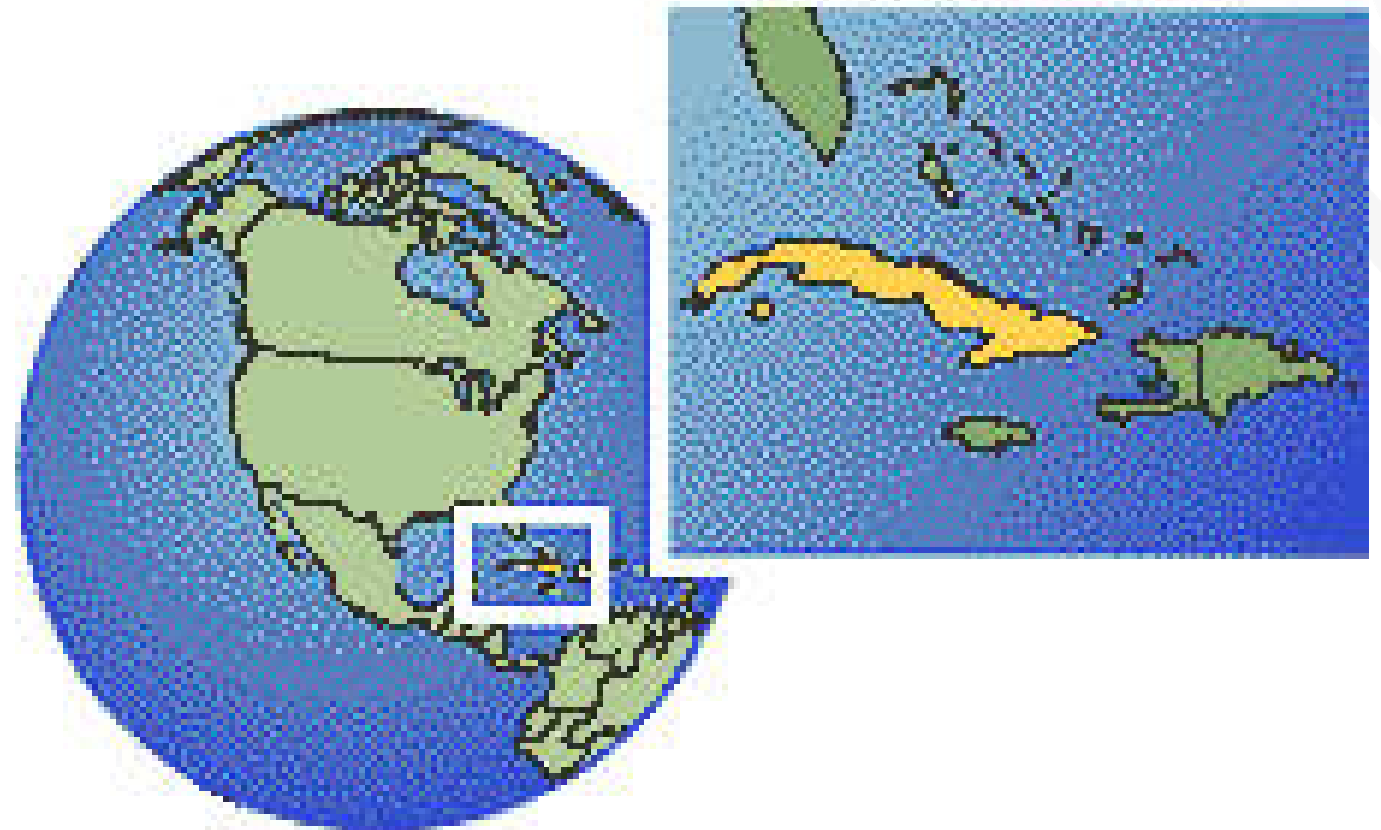
- Education Abroad Regulatory Practice

Visit www.nafsa.org/earp



Office of Foreign Assets Control

- General License vs. Specific License
- Authorized Travel vs. Tourism
- Financial/Bank Transactions and Spending Limits
- Record Keeping Requirements
- Employment of Local Staff in Cuba



The Cuban Assets Control Regulations

The Cuban Assets Control Regulations, 31 CFR Part 515

www.ecfr.gov

www.treasury.gov/cuba

12 Categories of Travel Activity Section 515.560(a)

- Family Visits
- Official Government Travel
- Journalistic Activity
- Professional Research and Professional Meetings
- Educational Activities
- Religious Activities
- Public Performances, Clinics, Workshops, Competitions, Exhibitions
- Support for the Cuban People
- Humanitarian Projects
- Activities of Private Foundations or Research or Educational Institutes
- Exportation, Importation, or Transmission of Information or Informational Materials
- Licensed Exportations

General License Provision - § 515.565(a)

- **§515.565(a): General License - Educational Activities**

The general license authorizes persons subject to U.S. jurisdiction, including U.S. academic institutions and their faculty, staff, and students, to engage in transactions, including travel-related transactions, related to the following educational activities:

General License Provision - § 515.565(a) (Cont.)

- (a)(1) Participation in a structured educational program in Cuba;
- (a)(2) Noncommercial academic research in Cuba specifically related to Cuba
- (a)(3) Participation in a formal course of study at a Cuban academic institution;

General License Provision - § 515.565(a) (Cont.)

- (a)(4) Teaching at a Cuban academic institution;
- (a)(5) Sponsorship of a Cuban scholar at the sponsoring U.S. academic institution
- **(a)(6) Educational exchanges sponsored by Cuban or U.S. secondary schools**
- (a)(7) Sponsorship of noncommercial academic seminars related to Cuba or global issues involving Cuba;

General License Provision - § 515.565(a) (Cont.)

- (a)(8) Establishment of academic exchanges and joint non-commercial academic research projects with universities or academic institutions in Cuba;
- (a)(9) Provision of standardized testing services;
- (a)(10) Provision of internet-based courses, including distance learning and Massive Open Courses to Cuban nationals provided the course content is at the undergraduate level or below;

General License Provision - § 515.565(a) (Cont.)

- (a)(11) The organization of, and preparation for, activities described in paragraphs (a)(1) through (a)(10) by employees or contractors of the sponsoring organization; or
- (a)(12) Facilitation by an organization or a member of the staff of such an organization of licensed educational activities on behalf of U.S. academic institutions or secondary schools

Grants, Scholarships and Awards

§515.590 The provision of grants, scholarships, or awards relating to the following activities to a Cuban national or in which Cuba or a Cuban national otherwise has an interest is authorized.

- (a) Educational activities
- (b) Humanitarian projects
- (c) Scientific research
- (d) Religious activities

General Travel Information

Information Materials

- Imports/exports of fully created informational materials exempt from regulation
- Other transactions related to creation, dissemination, alteration or enhancement authorized by

Use of Credit and Debit Cards

- Credit and debit cards can be used to pay for travel-related and other transactions consistent with

Per Diem Rate

- There is no per diem rate

General Travel Information (cont.)

Returning with Cuban-origin goods

- No limit from OFAC on value of Cuban-origin goods brought back to U.S. as accompanied baggage, normal limits on duty and tax exceptions now apply, personal use only.

Opening and maintaining bank accounts

- All transactions incident to the opening and maintenance of accounts, including the deposit of funds in such accounts by wire transfer, at a financial institution in Cuba are authorized.

General Travel Information (cont.)

Travel to Cuba

- Direct commercial or charter flights, ferries/cruise ships from the US to Cuba § 515.572
- Stops in third countries now authorized
- Travel certification

Travel via a Third Country

Travel for Tourist Activities is Prohibited

Context for Tulane University in Cuba



CUBAN AND CARIBBEAN
STUDIES INSTITUTE

Cuba Programming at Tulane:

- Cuban and Caribbean Studies Institute (1997)
- Office of Study Abroad (semester abroad, clearing house for all abroad undergraduate programs at Tulane)
- Programs: Semester, Summer, Undergraduate, Graduate
- Liberal Arts, Architecture, Research Methods, Public Health, K-12 Education, Law



International Students and Scholars from Cuba at Tulane

- Graduate Students
- Latin American Studies, History, Spanish and Portuguese, Aging Studies
- Visiting Scholars
- Conferences and Programming

The screenshot displays the Tulane University website's event and news section. On the left, under 'ALL EVENTS', there is a 'Jump to page:' navigation bar with numbers 1 through 10. Below this, four event listings are shown: 'Latin American Cinema Series' (October 1st-2nd, 2016), 'Dialogo con mi abuela' (September 22nd, 2016), 'La familia santiaguera: problemas estructurales y vida cotidiana' (September 15th, 2016), and 'Doing Business in Cuba Summit' (June 22nd, 2016). Each listing includes a brief description and a 'read more' link. On the right, under 'LATEST SITE UPDATES', there is a 'NEWS' section with a list of updates, including a new public health course, a Cuban theater publication, a keynote speaker announcement, and various grant opportunities. Below the news section is a 'Popular, Related Keywords' section with a list of tags such as 'cuba', 'caribbean', 'film', 'cuban & caribbean studies', 'lecture', 'community', 'art', 'haiti', 'cuban-american relations', 'history', 'conference', 'future of cuba', 'ccsi', 'summer study abroad', 'music', 'photography', 'school of public health and tropical medicine', 'public health in cuba', 'relief', 'study abroad', 'cuban film', 'revolution', 'afro-cuban', 'cibr', 'latin america', and 'latin american library'.



Tulane University: Licensing

License type

- General license
- Academic visa for any study program over 30 days



Tulane University: Finances

Managing financial transactions

- No current infrastructure for credit cards
- All transactions done in cash
- Conversation Rate: 1 Cuban Convertible Peso (CUC) = 1 US Dollar
- 3% service fee to exchange foreign currency to CUC
- An additional 10% charge to convert USD (Total 13% charge)
- Many students choose to bring Euros or Canadian dollars



Tulane University: Record Keeping

Record Keeping for Programs:

- All program expenses and receipts are filed through our online Concur system
- Students rarely keep any receipts of local purchases as receipts are uncommon in Cuba



Tulane University: Staffing

- Tulane does not employ long-term local staff (though others do).
- Tulane works directly with University of Havana and UNEAC.
- Also work with private and state-run local providers for guest lectures and organizing field trips.



Tulane University: Lessons Learned

- Support of faculty and staff (partnerships, carriers, negotiations)
- Banking/cash
- Communications – Internet – WIFI is being extended but is still limited and spotty. Cuban cell phones and SIM cards can be purchased at the airport, but lines are very long. Cell phone providers like Sprint and Verizon offer coverage in Cuba for additional costs. (Cost prohibitive but useful for emergencies.)
- Cross cultural preparation pre-departure
- Havana or outside Havana?
- Regulations and bureaucratic processes in Cuba are constantly changing?
- The large influx of tourism has raised prices for transportation and guide services



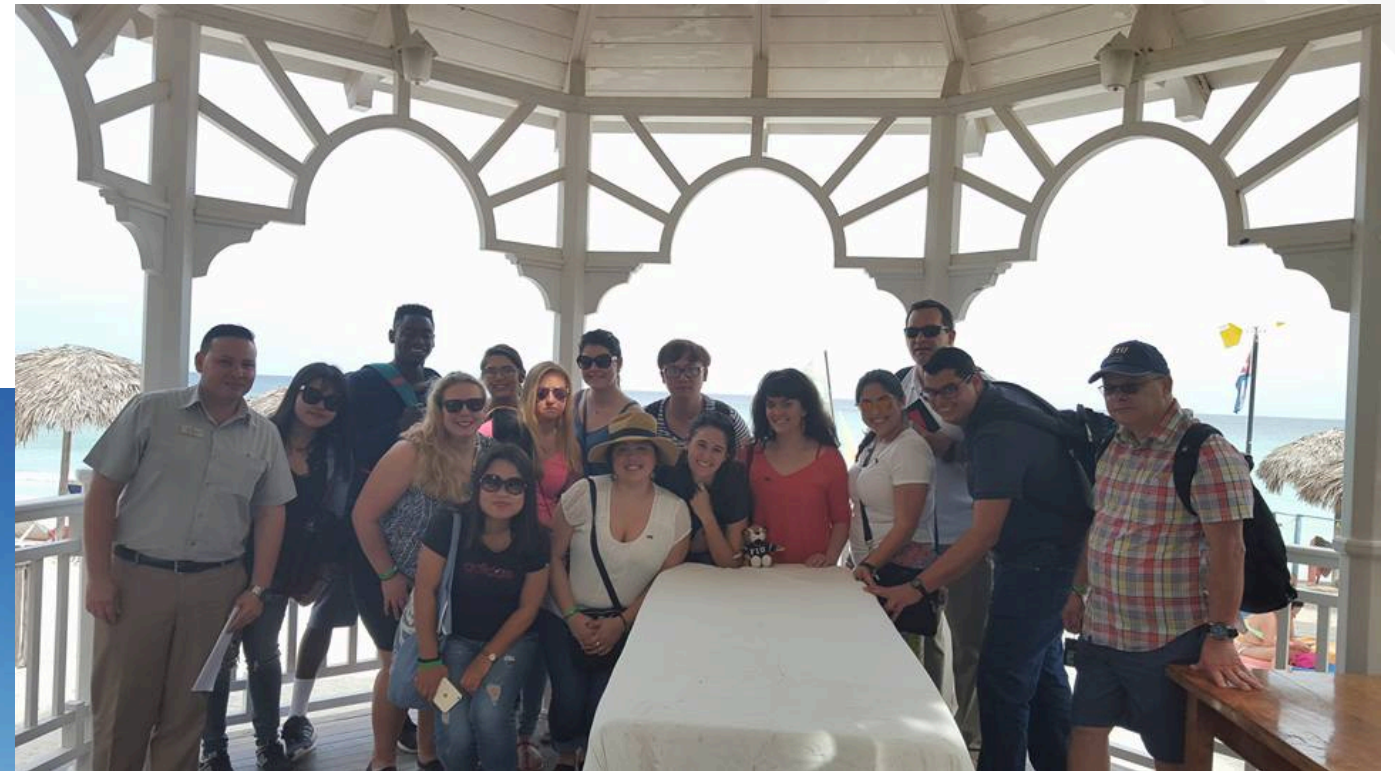
Context for Florida International University in Cuba

- Miami is 220 miles from Havana and is home to more than 1 million Cuban-Americans.
- Until July 2015, FIU faculty, staff and students were not able to do business with or travel to Cuba on FIU business because of Florida laws banning the use of state funds in travel to state sponsors of terrorism. Cuba was on that list until 2015.
- Since this change, FIU has been very interested in research on the island, study abroad programs and partnerships with Cuban universities.



FIU: Hospitality in Cuba Spring 2016

- Our Chaplin School of Hospitality led the first study abroad program to Cuba for FIU in March 2016. 13 students learned about the challenges and opportunities of hospitality in Havana in particular



FIU: Pre-departure advice for students going to Cuba

- Cuba is going to be very different from other places you may have visited. What are your expectations?
- For Cuban-Americans born in Cuba, additional requirements for visa.
- Cash only for the entire trip – bring enough!
- Two currencies in effect: CUC and Cuban national peso (moneda nacional). 1 CUC is officially one US dollar. 10% tax on US citizens.
- Subject to laws of Cuban state while in Cuba.
- Access to internet is very limited. Satellite phones are illegal in Cuba.

FIU: Interest on campus for future programs and partnerships

- Definite increased interest on our campus for Cuba programs
- Hospitality in Cuba Spring 2016
- Music in Cuba Spring 2017
- Definite interest in building partnerships with Cuban institutions
- Universidad de Cienfuegos and other universities outside of Havana



Q&A and Important Contacts

Web address for OFAC:

www.treasury.gov/ofac

OFAC Licensing Division

1-202-622-2480

OFAC Licensing Division

1500 Pennsylvania Avenue NW - Annex

Washington, DC 20220

OFAC_Feedback@treasury.gov

Further Opportunities to Engage

- NAFSA Annual Conference
 - Cuba Focus Track:
 - 100K Strong Capacity Building Workshop
 - Latin America Forum
 - Sessions Wednesday through Friday
 - Preconference workshops:
 - Collaborative Approaches to Developing Faculty-Led Programs
 - Risk Assessment and Crisis Management in Education Abroad Programming
 - Internships, Research, and Service Learning Abroad
 - Student Health and Safety Abroad



Further Opportunities to Engage

- Cuba Engagement Initiative
- Cuba Engagement Network
- Recording of this presentation will be available on the NAFSA website.

