

## Guidance for Academic and Research Activities with Individuals Ordinarily Resident in Cuba

*In addition to prohibiting our engaging in activities with individuals and entities that appear on the U.S. Department of Treasury’s Office of Foreign Assets Control’s (OFAC’s) list of Specially Designated Nationals and Blocked Persons, OFAC administers various U.S. sanctions. The most comprehensive sanctions prohibit, without OFAC authorization, providing certain services, technology, or goods to individuals and governments of those sanctioned countries.*

See the following table for guidance on various academic and research activities.

ACTIVITY	CATEGORY	AUTHORIZED?	REGULATORY INFO
<p><b>Professional research in Cuba</b></p> <p>-Purpose directly related to traveler’s profession, including graduate-level full-time study</p> <p>-Schedule does not include free time or recreation in excess of that consistent with full-time schedule of professional research</p>	<p>RESEARCH</p> <p>TRAVEL</p>	YES	<p>31 C.F.R. § 515.564(a)(1)</p> <p>U.S. persons may not lodge, pay for lodging, or make reservations for others, at any property on OFAC’s Cuba Prohibited Accommodations List</p>
<p><b>Professional meetings in Cuba</b></p> <p>-Purpose directly related to traveler’s profession, including graduate-level full-time study</p> <p>-Schedule does not include free time or recreation in excess of that consistent with a full-time schedule of attendance at, or organization of, professional meetings or conferences</p>	CONFERENCE	NO	<p>31 C.F.R. § 515.564(a)(2)</p> <p>OFAC Specific License Must Be Obtained by ECU Office of Export Controls</p> <p>U.S. persons may not lodge, pay for lodging, or make reservations for others, at any property on OFAC’s Cuba Prohibited Accommodations List</p>
<p><b>(i) Participation in a structured educational program in Cuba</b> as part of a course offered for credit by a U.S. graduate or undergraduate degree-granting academic institution that is sponsoring the program;</p> <p><b>(ii) Noncommercial academic research in Cuba</b> specifically related to Cuba and for the purpose of</p>	TEACHING	YES	<p>31 C.F.R. § 515.565</p> <p>U.S. persons may not lodge, pay for lodging, or make reservations for others, at any property on OFAC’s Cuba Prohibited Accommodations List</p>



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ACTIVITY	CATEGORY	AUTHORIZED?	REGULATORY INFO
<p>obtaining an undergraduate or graduate degree;</p> <p><b>(iii) Participation in a formal course of study at a Cuban academic institution,</b> provided the formal course of study in Cuba will be accepted for credit toward the student's graduate or undergraduate degree;</p> <p><b>(iv) Teaching at a Cuban academic institution related to an academic program at the Cuban institution,</b> provided that the individual is regularly employed by a U.S. or other non-Cuban academic institution;</p> <p><b>(v) Sponsorship of a Cuban scholar to teach or engage in other scholarly activity at the sponsoring U.S. academic institution</b> (in addition to those transactions authorized by the general license contained in §515.571)</p> <p><b>Provision of Internet-based, UNDERGRADUATE level or below, courses,</b> including distance learning and Massive Open Online Courses, to Cuban nationals, wherever located</p>			
<p><b>Provision of Internet-based, GRADUATE level or above, courses,</b> including distance learning and Massive Open Online Courses, to Cuban nationals, wherever located</p>	TEACHING	NO	OFAC Specific License Must Be Obtained by ECU Office of Export Controls
<p>Working w/ J-1 (Visiting Scholar), F-1 (Student) Visa</p>	TEACHING RESEARCH	YES	<not applicable>



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ACTIVITY	CATEGORY	AUTHORIZED?	REGULATORY INFO
<p>Holder Ordinarily Resident in Cuba On-Campus</p>			
<p>Working w/ J-1, F-1 Visa Holders Ordinarily Resident in Cuba After Return to Cuba</p>	<p>TEACHING</p> <p>RESEARCH</p>	<p>MAYBE</p>	<p>OFAC Specific License Must Be Obtained by ECU Office of Export Controls unless certain conditions are met and the activity leads to a written publication</p>
<p>Journal Editor Routine, yet Substantive, Editing or Routine Peer Review with Intent to Publish</p>	<p>PEER REVIEW</p> <p>JOURNAL EDITOR</p>	<p>YES</p>	<p>31 C.F.R. § 515.577</p> <p>OFAC Guidance on Certain Publishing Activities (October 28, 2016)</p>
<p>Providing Individualized Dissertation Editing or Non-Routine Peer Review, Co-authoring, or Providing Technical Assistance</p>	<p>INDIVIDUALIZED SERVICE</p>	<p>MAYBE</p>	<p>OFAC Specific License Must Be Obtained by ECU Office of Export Controls unless certain conditions are met and the activity leads to a written publication</p> <p>OFAC Guidance on Certain Publishing Activities (October 28, 2016)</p>

### Need Assistance?

Each regulation has many nuances. If you are uncertain whether or not your activity is authorized, or if you would like to engage in an otherwise prohibited activity, contact us at [ECUExportControls@ecu.edu](mailto:ECUExportControls@ecu.edu). The ECU Office of Export Controls and Customs can apply for specific OFAC licenses and provide additional guidance.



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