

**EDUCATIONAL ACTIVITIES – 31 C.F.R. §515.565
(People to People)**

Application criteria for Specific Licenses for certain educational exchanges not involving academic study pursuant to a degree program – 31 C.F.R. § 515.565(b)(2):

Pursuant to section 515.565(b)(2), OFAC may issue a specific license to an organization that sponsors and organizes programs to promote people-to-people contact authorizing the organization and individuals traveling under its auspices to engage in educational exchanges not involving academic study pursuant to a degree program. In general, licenses issued pursuant to this policy will be valid for one year and will contain no limitation on the number of trips that can be taken.

If your organization wishes to apply for a license pursuant to section 515.565(b)(2), it must provide the following information in a letter to OFAC or use OFAC's online application form (see below).

1. **Identify your organization.** Provide the name and address of your organization and include the name and phone number of the organization's contact responsible for the application and for ensuring compliance with the terms of the license once issued.
2. **Identify the type of travel.** State that your organization requests a specific license pursuant to section 515.656(b)(2) of the Regulations to engage in educational exchanges.
3. **Provide information about your organization.** Provide information that illustrates how your organization sponsors and organizes educational exchanges not involving academic study pursuant to a degree program and for the purpose of promoting people-to-people contact.
4. **Provide and describe examples of activities.** Provide a list of the types of activities to be engaged in by individuals traveling under your program(s). Also provide a few detailed examples of those activities and explain how those activities would result in meaningful interaction between the U.S. travelers and individuals in Cuba.
5. **Provide a certification.** Provide a certification that:
 - a. Each traveler will have a full-time schedule of educational exchange activities that will result in meaningful interaction between the travelers and individuals in Cuba; and
 - b. The predominant portion of the activities to be engaged in by individuals traveling under your program(s) will not be with individuals or entities acting for or on behalf of a prohibited official of the Government of Cuba, as defined in 31 C.F.R.515.337*, or a prohibited member of the Cuban Communist Party, as defined by 31 C.F.R.515.338** (*and **see below).
6. **Extensions and Renewals.** When applying for an extension or renewal of a license, be sure to reference the license number in your application and include the following:
 - a. An explanation of why an extension or renewal is necessary;
 - b. A detailed report setting forth a record of all activities undertaken pursuant to the license and any amendments. The report should include a detailed description of each activity, the dates of travel of each trip and the number of individuals that traveled on each trip; and
 - c. A complete copy of the license and any license amendments.
7. **Sign your letter.** Your signature is your certification that the statements in your application are true and accurate.

Potentially licensable under the current policy

Example: An organization wishes to sponsor and organize trips for individuals to learn side-by-side with Cuban individuals in such areas as environmental protection or the arts.

Normally not licensable under current policy

Example 1: An organization wishes to sponsor and organize trips to Cuba in which travelers engage in individually-selected and/or self-directed activities. Authorized trips are expected to be led by the licensed organization and to have a full-time schedule of activities in which the travelers will participate.

Example 2: An organization wishes to sponsor and organized trips to Cuba in which travelers only attend large lectures or otherwise engage in a schedule of activities that do not involve interaction with Cuban individuals.

To use the online form process, go to <http://cubatravel.ofac.treas.gov>

Mailing address: Applications for specific licenses under this category should be submitted to:

Licensing Division
Office of Foreign Assets Control
U.S. Department of the Treasury
1500 Pennsylvania Avenue N.W.
Washington, D.C. 20220
Tel. 202/622/2480

Website address:

<http://www.treasury.gov/resource-center/sanctions/Programs/pages/cuba.aspx>

[Note that you are not prohibited from meeting with these officials of the Government of Cuba or these leaders of the Cuban Communist Party listed below, but the “predominant portion” of your activities cannot be with them. The following is OFAC’s definition of these categories]

*** §515.337 Prohibited officials of the Government of Cuba**

For purposes of this part the term *prohibited officials of the Government of Cuba* means Ministers and Vice-ministers, members of the Council of State and the Council of Ministers; members and employees of the National Assembly of People’s Power; members of any provincial assembly; local sector chiefs of the Committees for the Defense of the Revolution; Director Generals and sub-Director Generals and higher of all Cuban ministries and state agencies; employees of the Ministry of the Interior (MININT); employees of the Ministry of Defense (MINFAR); secretaries and first secretaries of the Confederation of Labor of Cuba (CTC) and its component unions; chief editors, editors, and deputy editors of Cuban state-run media organizations and programs, including newspapers, television, and radio; and members and employees of the Supreme Court (Tribunal Supremo Nacional).

****§515.338 Prohibited members of the Cuban Communist Party**

For purposes of this part, the term *prohibited members of the Cuban Communist Party* means members of the Politburo, the Central Committee, Department Heads of the Central Committee, employees of the Central Committee, and secretaries and first secretaries of the provincial Party central committees.