

## Update Regarding Cuba Sanctions and Research Collaborations with Cuba

Since January of last year, the President, along with the Commerce and Treasury Departments, have announced successive amendments to the Cuban sanctions regime, effectively easing sanctions on a number of activities with Cuba. This easing of sanctions has provided some expanded opportunities for academic and research collaborations with Cuba through new general licenses. If your activities fall within the parameters of these general licenses, you do not need special permission from the U.S. government to conduct your activities.

It is important to note that, despite this sanctions relief, many of the U.S. sanctions on Cuba remain in place for U.S. Persons and entities (including Harvard and US citizens and green-card holders), and any activities with Cuba require continued diligence. For specific questions regarding collaborations with individuals in Cuba or those ordinarily resident there, shipments to Cuba, or travel to Cuba, please contact your [School's Export Control Officer](#). For specific questions regarding travel to Cuba, you may also contact [Global Support Services](#).

**Certain Educational Services, Academic Exchanges and Sponsorship Authorized.** Harvard faculty, students and researchers may:\*

- Participate in a structured educational program **in Cuba** as part of a course offered for credit at Harvard.
- Participate in a formal course of study at a Cuban academic institution, provided the formal course of study will be accepted for credit toward the student's undergraduate and graduate degree.
- Engage in noncommercial academic research specifically related to Cuba in **Cuba**.
- Teach at a Cuban academic institution related to an academic program at the Cuban institution.
- Establish a physical presence in Cuba to engage in authorized transactions.
- Sponsor, including the payment of a stipend or salary to, a Cuban scholar to teach or engage in scholarly activity **at Harvard**.
- Provide educational grants, scholarships, or awards to a Cuban national or in which Cuba or a Cuban national otherwise has an interest.
- Provide grants or awards for humanitarian projects in or related to Cuba that are designed to directly benefit the Cuban people.
- Sponsor, or co-sponsor, noncommercial academic seminars, conferences and workshops related to Cuba or global issues involving Cuba.
- Provide internet-based courses, including distance learning and Massive Open Online Courses, to Cuban nationals, wherever located, provided that the course content is at the undergraduate level or below; and
- Provide standardized testing services, including professional certificate examinations, university entrance examinations, and language examinations, and related preparatory services for such exams, to Cuban nationals, wherever located;

**Travel to Cuba.** Travel-related transactions for certain travel to, from and within Cuba are permitted for travel to Cuba for:\*\*

- Professional research in Cuba relating to the traveler's profession, professional background or expertise
- Attendance at professional meetings or conferences in Cuba relating to a traveler's profession, professional background, or area of expertise
- Educational exchanges

\* As some restrictions may apply, you should contact your [School's Export Control Officer](#) to confirm that the collaboration you are planning or the activities you are planning to engage in are permissible.

\*\* For travel to Cuba under the new general licenses, the travel cannot include free time or recreation in excess of that consistent with a full-time schedule of authorized activities. Also, if it is a group trip, all members of the group must qualify for permissible travel. An entire group does not qualify merely because some members of the group qualify.