

**707. What constitutes “support for the Cuban people” for generally authorized travel and other transactions?**

Section [515.574 of the CACR](#) contains a general license that authorizes, subject to conditions, travel-related transactions and other transactions that are intended to provide support for the Cuban people, which include activities of recognized human rights organizations; independent organizations designed to promote a rapid, peaceful transition to democracy; and individuals and non-governmental organizations that promote independent activity intended to strengthen civil society in Cuba. In accordance with NSPM-5, OFAC amended this general license on November 8, 2017 to require that each traveler utilizing this authorization engage in a full-time schedule of activities that enhance contact with the Cuban people, support civil society in Cuba, or promote the Cuban people’s independence from Cuban authorities and that result in meaningful interactions with individuals in Cuba. OFAC also amended this general license to exclude from the authorization certain direct financial transactions with entities and subentities identified on the State Department’s [Cuba Restricted List](#). Also, and effective September 24, 2020, OFAC amended this general license to exclude from the authorization lodging, paying for lodging, or making any reservation for or on behalf of a third party to lodge, at any property in Cuba on the Cuba Prohibited Accommodations List to the extent prohibited by § 515.210. For a complete description of the scope of this prohibition, see 31 CFR § 515.210. The traveler’s schedule of activities must not include free time or recreation in excess of that consistent with a full-time schedule in Cuba. An entire group does not qualify for this general license merely because some members of the group qualify individually. For a complete description of what this general license authorizes and the restrictions that apply, see 31 CFR § 515.574.

**711. What are examples of a full-time schedule of activities for authorized travelers?**

Authorized travelers to Cuba pursuant to most general license categories are expected to maintain a full-time schedule of activities consistent with the terms of the general license(s) pursuant to which they are traveling. For example:

**Example 1 to [§ 515.574](#):**

An individual plans to travel to Cuba, stay in a room at a rented accommodation in a private Cuban residence (*casa particular*), eat at privately-owned Cuban restaurants (*paladares*), and shop at privately-owned stores run by self-employed Cubans (*cuentapropista*) during his or her four-day trip. While at the *casa particular*, the individual will have breakfast each morning with the Cuban host and engage with the Cuban host to learn about Cuban culture. The traveler will not lodge, or pay for lodging, at any property on the CPA List to the extent prohibited by [§ 515.210](#). In addition, the traveler will complete his or her full-time schedule by supporting Cuban entrepreneurs launching their privately-owned businesses. The traveler's activities promote independent activity intended to strengthen civil society in Cuba. Because the individual's qualifying activities are not limited to staying in a room at a rented accommodation in a private Cuban residence (*casa particular*), eating at privately-owned Cuban restaurants (*paladares*), and shopping at privately owned stores run by self-employed Cubans (*cuentapropista*) and the traveler maintains a full-time schedule that enhances contact with the

Cuban people, supports civil society in Cuba, and promotes the Cuban people's independence from Cuban authorities, and that results in meaningful interaction between the traveler and Cuban individuals, the individual's travel qualifies for the general license.

**Example 2 to [§ 515.574](#):**

A group of friends plans to travel and maintain a full-time schedule throughout their trip by volunteering with a recognized non-governmental organization to build a school for underserved Cuban children with the local community. In their free time, the travelers plan to rent bicycles to explore the streets of Havana and visit an art museum. The travelers will not lodge, or pay for lodging, at any property on the CPA List to the extent prohibited by [§ 515.210](#). The travelers' trip would qualify for the general license because the volunteer activities promote independent activity intended to strengthen civil society in Cuba and constitute a full-time schedule that enhances contact with the Cuban people and supports civil society in Cuba, and results in meaningful interaction between the travelers and individuals in Cuba.

[[80 FR 2299](#), Jan. 16, 2015, as amended at [82 FR 52003](#), Nov. 9, 2017; [85 FR 60072](#), Sept. 24, 2020]