

## **Frequently Asked Questions Related to Cuba**

January 15, 2015

*This document is explanatory only, does not have the force of law, and does not supplement or modify the Executive Orders, statutes, or regulations relating to Cuba. Where specific questions arise about applicability, scope, impact, or any other aspects of these sanctions, it is the responsibility of individuals or entities seeking guidance to review the relevant statutes, regulations, and Executive Orders, and, if appropriate, consult with legal counsel.*

### **I. Embargo**

#### **1. Where can I find the amendments to the Cuban Assets Control Regulations (CACR)?**

Please see the [Federal Register](#).

#### **2. When is the amendment to the CACR effective?**

The amendment will be effective when published in the Federal Register on January 16, 2015.

#### **3. Are sanctions on Cuba still in place following the President's announcement on December 17, 2014?**

Yes, the Cuba embargo remains in place. Most transactions between the United States, or persons subject to U.S. jurisdiction, and Cuba continue to be prohibited, and OFAC continues to enforce the prohibitions of the CACR. These changes are targeted to further engage and empower the Cuban people by facilitating authorized travel to Cuba by U.S. persons, certain authorized commerce, and the flow of information to, from, and within Cuba.

#### **4. Is the Department of Commerce also amending its rules?**

Yes. The Department of Commerce is amending its rules which will, among other things, authorize the export of certain items to the Cuban private sector and to improve the free flow of information to, from, and among the Cuban people. For additional information, please see the Bureau of Industry and Security website at: <http://www.bis.doc.gov>.

### **II. Travel**

#### **5. What are the travel changes to the Cuba program?**

OFAC has issued general licenses within the 12 categories of authorized travel for many travel-related transactions to, from, or within Cuba that previously required a specific license (i.e., an application and a case-by-case determination).

Travel-related transactions are permitted by general license for certain travel related to the following activities, subject to criteria and conditions in each general license: family visits; official business of the U.S. government, foreign governments, and certain intergovernmental organizations; journalistic activity; professional research and professional meetings; educational activities; religious activities; public performances, clinics, workshops, athletic and other competitions, and exhibitions; support for the Cuban people; humanitarian projects; activities of private foundations or research or educational institutes; exportation, importation, or transmission of information or information materials; and certain authorized export transactions.

**6. Do travelers who fall within the scope of a general license need to submit a written request to OFAC for permission to travel or conduct transactions?**

No. No further permission from OFAC is required to engage in transactions by a person who meets all criteria in a general license. Individuals wishing to engage in activities that may fall within the scope of a general license should review the relevant general licenses contained in the CACR to determine whether their travel-related transactions are covered by such general licenses. Persons subject to U.S. jurisdiction who wish to engage in any travel within the 12 categories of activities specified in the CACR that does not meet the requirements of a general license will need to apply for a specific license from OFAC.

**7. Is travel to Cuba for tourist activities permitted?**

No. Consistent with the Trade Sanctions Reform and Export Enhancement Act of 2000 (TSRA), travel-related transactions involving Cuba are only permitted for the 12 categories of activities identified in the CACR. Travel-related transactions for other purposes remain prohibited.

**8. What constitutes “a close relative” for generally authorized family travel?**

OFAC regulations generally authorize U.S. persons and those sharing a dwelling with them as a family to visit a close relative in Cuba, including a close relative who is a Cuban national or ordinarily resident there, who is a U.S. Government official on official government business, or who is a student or faculty member engaging in authorized educational activities in Cuba with a duration of over 60 days. A close relative is defined as any individual related to a person “by blood, marriage, or adoption who is no more than three generations removed from that person or from a common ancestor with that person.” For a complete description of what this general license authorizes and the restrictions that apply, please see 31 CFR § 515.339 and § 515.561.

**9. Who is generally authorized to engage in travel and travel-related transactions for “journalistic activity”?**

OFAC has issued an expanded general license that incorporates prior specific licensing policy and authorizes, subject to appropriate conditions, travel-related transactions and

other transactions that are directly incident to journalistic activities in Cuba. Among other things, this general license authorizes, subject to appropriate conditions, full-time journalists, supporting broadcast or technical personnel, and freelance journalists to travel to Cuba. The traveler's schedule of activities must not include free time or recreation in excess of that consistent with a full-time schedule. An entire group does not qualify for the 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, please see 31 CFR § 515.563.

**10. What constitutes generally authorized travel-related transactions for “professional research” and “professional meetings” in Cuba?**

OFAC has issued an expanded general license that incorporates prior specific licensing policy and authorizes, subject to appropriate conditions, travel-related transactions and other transactions that are directly incident to professional research in Cuba. Among other things, this general license authorizes, subject to appropriate conditions, professional research in Cuba relating to a traveler's profession, professional background, or area of expertise. The traveler's schedule of activities must not include free time or recreation in excess of that consistent with a full-time schedule. An entire group does not qualify for the 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, please see 31 CFR § 515.564.

OFAC has issued an expanded general license that incorporates prior specific licensing policy and authorizes, subject to appropriate conditions, travel-related transactions and other transactions that are directly incident to professional meetings in Cuba. Among other things, this general license authorizes, subject to appropriate conditions, professional meetings or conferences in Cuba relating to a traveler's profession, professional background, or area of expertise, provided that the purpose of the meeting or conference is not the promotion of tourism in Cuba. Travel in this category is generally licensed provided that the traveler's schedule of activities does not include free time or recreation in excess of that consistent with a full-time schedule. An entire group does not qualify for the 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, please see 31 CFR § 515.564.

**11. What constitutes “educational activities” for generally authorized travel?**

OFAC has issued an expanded general license that incorporates prior specific licensing policy and authorizes, subject to appropriate conditions, travel-related transactions and other transactions that are directly incident to certain educational activities in Cuba. Among other things, this general license authorizes, subject to appropriate conditions, faculty, staff, and students at U.S. academic institutions and secondary schools to engage in certain educational activities in Cuba, Cuban scholars to engage in certain educational activities in the United States, certain activities to facilitate licensed educational programs, and certain people-to-people travel. An entire group does not qualify for the

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, please see 31 CFR § 515.565.

**12. Are secondary schools and secondary school students permitted to engage in travel-related transactions under the general license for “educational activities”?**

Yes. Educational exchanges sponsored by Cuban or U.S. secondary schools involving secondary school students’ participation in a formal course of study or in a structured educational program offered by a secondary school or other academic institution, and led by a teacher or other secondary school official, are authorized under this general license. For a complete description of what this general license authorizes and the restrictions that apply, please see 31 CFR § 515.565 (a)(6). This provision allows for participation of a reasonable number of adult chaperones to accompany the secondary school student(s) to Cuba.

**13. What constitutes “people-to-people travel” for generally authorized travel?**

OFAC has issued a general license that incorporates prior specific licensing policy and authorizes, subject to appropriate conditions, travel-related transactions and other transactions that are directly incident to people-to-people educational activities in Cuba. Among other things, this general license authorizes, subject to appropriate conditions, persons subject to U.S. jurisdiction to engage in certain educational exchanges in Cuba under the auspices of an organization that is a person subject to U.S. jurisdiction and sponsors such exchanges to promote people-to-people contact. Additionally, an employee, paid consultant, or agent of the sponsoring organization must accompany each group traveling to Cuba to ensure the full-time schedule of educational exchange activities, and the predominant portion of the activities must not be with individuals or entities acting for or on behalf of a prohibited official of the Government of Cuba, as defined in 31 CFR § 515.337, or a prohibited member of the Cuban Communist Party, as defined in 31 CFR § 515.338. For a complete description of what this general license authorizes and the restrictions that apply, please see 31 CFR § 515.565(b).

**14. Who is generally authorized to engage in travel-related transactions for “religious activities”?**

OFAC has issued an expanded general license that incorporates prior specific licensing policy and authorizes, subject to appropriate conditions, travel-related transactions and other transactions that are directly incident to religious activities in Cuba. All persons subject to U.S. jurisdiction, including religious organizations located in the United States and members and staff of such organizations, are generally authorized to engage in travel-related transactions that are directly incident to engaging in religious activities in Cuba provided, among other things, that the travel must be for the purpose of engaging in a program of religious activities. 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. For

a complete description of what this general license authorizes and the restrictions that apply, please see 31 CFR § 515.566.

**15. What constitutes “public performances, clinics, workshops, athletic and other competitions, and exhibitions” for generally authorized travel?**

OFAC has issued an expanded general license that incorporates prior specific licensing policy and authorizes, subject to appropriate conditions, travel-related transactions and other transactions that are directly incident to participation in amateur and semi-professional international sports federation competitions as well as other athletic and other competitions and public performances, clinics, workshops, and exhibitions in Cuba. For a complete description of what this general license authorizes and the restrictions that apply, please see 31 CFR § 515.567.

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

OFAC has issued a general license that incorporates prior specific licensing policy and authorizes, subject to appropriate 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. 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. For a complete description of what this general license authorizes and the restrictions that apply, please see 31 CFR § 515.574.

**17. What constitutes “humanitarian projects” for generally authorized travel and other transactions?**

OFAC has issued a general license that incorporates prior specific licensing policy and authorizes, subject to appropriate conditions, travel-related transactions and other transactions that are related to humanitarian projects in or related to Cuba. These authorized humanitarian projects include medical and health-related projects; construction projects intended to benefit legitimately independent civil society groups; environmental projects; projects involving formal or non-formal educational training, within Cuba or off-island, on the following topics: entrepreneurship and business, civil education, journalism, advocacy and organizing, adult literacy, or vocational skills; community-based grassroots projects; projects suitable to the development of small-scale private enterprise; projects that are related to agricultural and rural development that promote independent activity; microfinancing projects, except for loans, extensions of credit, or other financing prohibited by 31 C.F.R. § 515.208; and projects to meet basic human needs. 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. For a complete

description of what this general license authorizes and the restrictions that apply, please see 31 CFR § 515.575.

**18. What constitutes “activities of private foundations or research or educational institutes” for generally authorized travel?**

OFAC has issued a general license that incorporates previous specific licensing policy and authorizes, subject to appropriate conditions, travel-related transactions and other transactions that are directly incident to activities by private foundations or research or educational institutes with an established interest in international relations to collect information related to Cuba for noncommercial purposes, among other things. 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. For a complete description of what this general license authorizes and the restrictions that apply, please see 31 CFR § 515.576.

**19. What constitutes “exportation, importation or transmission of information or informational materials” for generally authorized travel?**

OFAC has issued a general license that incorporates prior specific licensing policy and authorizes, subject to appropriate conditions, travel-related transactions and other transactions that are directly incident to the exportation, importation, or transmission of information or informational materials in Cuba. 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. For a complete description of what this general license authorizes and the restrictions that apply, please see 31 CFR § 515.545. The definition of “information and informational materials” may be found at 31 CFR § 515.332.

**20. Can I purchase a ticket to Cuba directly from an airline based or operating out of the United States?**

If you are traveling to Cuba pursuant to a general or specific license issued by the Treasury Department’s Office of Foreign Assets Control (OFAC) then, as had been the case under the previous regulations for purchasing charter air transportation, you would purchase your air travel through a tour operator. At this time, only charter service is available. While the new OFAC regulations will no longer preclude scheduled operations, the U.S. Department of Transportation will establish procedures for restoration of scheduled service. Once scheduled service is restored, passengers purchasing a ticket for scheduled service to Cuba will be able to purchase their ticket directly from the airline offering the service. Airlines and travelers are responsible for maintaining records of their Cuba-related transactions for at least five years.

**21. Are there any spending limits for authorized U.S. travelers while in Cuba?**

The per diem rate previously imposed no longer applies, and there is no specific dollar limit on authorized expenses. Authorized travelers may engage in transactions ordinarily incident to travel within Cuba, including payment of living expenses and the acquisition

in Cuba of goods for personal consumption there; other expenditures, other than those directly incident to the traveler's authorized activities in Cuba, are not authorized. In addition, travelers are authorized to acquire in Cuba and import as accompanied baggage into the United States merchandise with a value not to exceed \$400 per person, provided that no more than \$100 of the merchandise consists of alcohol or tobacco products and the merchandise is imported for personal use only.

**22. Are there any restrictions on what foreign persons entering the United States from travel that included Cuba may bring in their accompanied baggage?**

A non-U.S. person (i.e. not a U.S. citizen or resident) arriving in the United States is authorized to import Cuban-origin merchandise, other than tobacco and alcohol, as accompanied baggage provided the merchandise is not in commercial quantities and not imported for resale. *See* 31 CFR § 515.569. If the non-U.S. person is on a trip that included travel to Cuba, the person also is authorized to import as accompanied baggage alcohol or tobacco products purchased or otherwise acquired in Cuba with a value not to exceed \$100 for personal use only. *See* 31 CFR § 515.560(c)(3).

**23. Can I purchase Cuban-origin cigars and/or Cuban-origin rum or other alcohol while traveling in Cuba?**

Persons authorized to travel to Cuba may purchase alcohol and tobacco products while in Cuba for personal consumption while there. Authorized travelers may return to the United States with up to \$100 worth of alcohol and/or tobacco products acquired in Cuba in accompanied baggage, for personal use only.

**24. Can I purchase Cuban-origin cigars and/or Cuban-origin rum or other Cuban-origin alcohol over the internet or while in a third country (i.e., not Cuba)?**

No. These transactions remain prohibited, and OFAC has not issued any general license that would authorize them.

**III. Travel Services**

**25. Do air carriers need to obtain specific licenses from OFAC to provide services?**

No. A new general license authorizes persons subject to U.S. jurisdiction to provide air carrier services to, from, or within Cuba, in connection with authorized travel, without the need for a specific license from OFAC. However, while no additional license is required from OFAC, air carriers wishing to provide service will still need to secure regulatory approvals from other concerned U.S. Government agencies, including the Department of Transportation (Office of the Secretary and the Federal Aviation Administration) and the Department of Homeland Security. For a complete description of what the OFAC general license authorizes and the restrictions that apply, please see 31 CFR § 515.572(a)(2).

**26. Do travel service providers (such as travel agents and tour group operators) need to obtain specific licenses from OFAC to provide services for travel to Cuba?**

No. A new general license authorizes persons subject to U.S. jurisdiction, including travel agents and tour group operators, to provide travel services in connection with authorized travel without the need for specific licenses from OFAC. For a complete description of what this general license authorizes and the restrictions that apply, please see 31 CFR § 515.572(a)(1). The provision of services related to travel for tourist or other unauthorized travel to Cuba remains prohibited.

**27. Are airlines and travel service providers required to verify that an individual traveler is authorized to travel to Cuba?**

Persons subject to U.S. jurisdiction providing authorized carrier or travel services must retain for at least five years from the date of the transaction a certification from each customer indicating the provision of the CACR that authorizes the person to travel to Cuba. In the case of a customer traveling under a specific license, a copy of the license must be maintained on file. The names and addresses of individual travelers must also be maintained on file for at least five years. *See* 31 CFR § 515.572(b).

**IV. Remittances**

**28. What changes have been made with respect to authorized remittances by U.S. persons to Cuba?**

The limits on generally licensed periodic remittances that may be sent to a Cuban national, other than a prohibited official of the Government of Cuba or a prohibited member of the Cuban Communist Party, have been raised from \$500 per quarter to \$2,000 per quarter. For a complete description of what the OFAC general license authorizes and the restrictions that apply, please see 31 CFR § 515.570(b).

Certain remittances to Cuban nationals for humanitarian projects, support for the Cuban people, or development of private business are now generally authorized. For a complete description of what the OFAC general license authorizes and the restrictions that apply, please see 31 CFR § 515.570(g).

The amount of authorized remittances travelers to Cuba may carry has been increased to \$10,000 per authorized trip. For a complete description of this authorization and the restrictions that apply, please see 31 CFR § 515.560(c)(4).

**29. Is a bank, credit union, or money service business (MSB) such as a money remitter permitted to process my authorized remittances to Cuba?**

Yes. Under the new general licenses, banking institutions, as defined in 31 CFR § 515.314, U.S.-registered brokers or dealers in securities, and U.S.-registered money transmitters are permitted to process authorized remittances to Cuba without having to

obtain a specific license, subject to the recordkeeping and reporting requirements set forth therein. For a complete description of what the OFAC general license authorizes and the restrictions that apply, please see 31 CFR § 515.572(a)(3).

## **V. Banking**

### **30. Are authorized travelers in Cuba permitted to use credit or debit cards issued by a U.S. financial institution?**

Yes. Travelers are advised to check with their financial institution before traveling to Cuba to determine whether the institution has established the necessary mechanisms for its credit or debit cards to be used in Cuba. *See* 31 CFR § 515.560(c)(5) and 515.584(c).

### **31. Can my bank refuse to allow me to use my credit or debit card in Cuba?**

OFAC regulations do not require financial institutions or credit card companies to accept, maintain, or facilitate authorized financial relationships or transactions.

### **32. Are financial institutions other than banks permitted to open correspondent accounts in Cuba?**

Depository institutions, as defined in 31 CFR § 515.533, which include certain financial institutions other than banks, are permitted to open correspondent accounts at banks in Cuba. *See* 31 CFR § 515.584(a).

### **33. Are Cuban banks permitted to open correspondent accounts at U.S. banks?**

No. U.S. depository institutions are permitted to open correspondent accounts at Cuban banks located in Cuba and in third countries, and at foreign banks located in Cuba, but Cuban banks are not generally licensed to open such accounts at U.S. banks. *See* note to 31 CFR § 515.584(a).

### **34. In what ways can Cuban nationals lawfully present in the United States participate in the U.S. financial system?**

Certain Cuban nationals who have taken up residence in the United States on a permanent basis and who meet the requirements set forth in 31 CFR § 515.505 are licensed as unblocked nationals, and may participate fully in the U.S. financial system. *See* 31 CFR § 515.505(a)(1); (d).

Pursuant to 31 CFR § 515.571, Cuban nationals who are present in the United States in a non-immigrant status or pursuant to other non-immigrant travel authorization issued by the U.S. government, such as a non-immigrant visa, may open and maintain bank accounts for the duration of their stay in the United States in such status. Accounts that are not closed prior to the departure of Cuban nationals from the United States must be blocked and reported as such. Section 515.571 also authorizes such Cuban nationals to

engage in normal banking transactions involving foreign currency drafts, travelers' checks, or other instruments negotiated incident to travel in the United States.

**35. If a Cuban national resident in the United States has applied to become a lawful permanent resident alien of the United States, does that individual have to apply to OFAC to be treated as an unblocked national?**

No. If a Cuban national has taken up residence in the United States and has applied to become a lawful permanent resident alien of the U.S. and has an adjustment of status application pending, then the Cuban national is considered unblocked and does not need to apply to OFAC to be treated as an unblocked national, provided that he or she is not a prohibited official of the Government of Cuba or a prohibited member of the Cuban Communist party. *See* 31 CFR § 515.505(a)(1).

**36. What new transactions involving wire transfers to Cuba are authorized?**

OFAC has issued a new general license that authorizes U.S. depository institutions to reject funds transfers originating and terminating outside the United States where neither the originator nor the beneficiary is a person subject to U.S. jurisdiction and provided that certain prohibited individuals do not have an interest in the transfer. U.S. depository institutions are authorized to process such funds transfers where they would be authorized pursuant to the CACR if the originator or beneficiary were a person subject to U.S. jurisdiction. For a complete description of what this general license authorizes and the restrictions that apply, please see 31 CFR § 515.584(d).

**VI. Trade/Business**

**37. Is Cuba open for U.S. business and investment?**

Persons subject to U.S. jurisdiction are prohibited from doing business or investing in Cuba unless licensed by OFAC. An OFAC general license authorizes the exportation from the United States, and the reexportation of 100% U.S.-origin items from third-countries, to Cuba only in those cases where the exportation or reexportation is licensed or otherwise authorized by the Commerce Department. The Commerce Department currently authorizes limited categories of items to be exported or reexported to Cuba.

**38. Can U.S. trade delegations travel to Cuba?**

Trade delegations are authorized to travel to Cuba only if each member of the delegation meets the criteria of an applicable general license authorizing travel to Cuba or has obtained a specific license from OFAC.

**39. Are insurers allowed to provide travel insurance for authorized travel to Cuba?**

Yes. *See* 31 CFR § 515.560.

**40. What types of Cuban-origin goods are authorized for importation into the United States?**

Persons subject to U.S. jurisdiction authorized to travel to Cuba may import into the United States as accompanied baggage merchandise acquired in Cuba with a value not to exceed \$400 per person, including no more than \$100 in alcohol and tobacco products.

Persons subject to U.S. jurisdiction are also authorized to import certain goods produced by independent Cuban entrepreneurs as determined by the State Department, to be set forth in the State Department's Section 515.582 list, [www.state.gov/e/eb/tfs/spi/](http://www.state.gov/e/eb/tfs/spi/). (As of the date of the issuance of these FAQs, the State Department had not yet published its list.)

The importation into the United States from Cuba of information and informational materials is exempt from the prohibitions of the Cuban Assets Control Regulations. The definition of "information and informational materials" may be found at 31 CFR § 515.332.

**VII. Telecommunications**

**41. What types of telecommunications and internet-based services are authorized under general license?**

OFAC has issued an expanded general license which, subject to appropriate conditions, generally authorizes transactions that establish mechanisms to provide commercial telecommunications services in Cuba or linking third countries and Cuba. OFAC has also updated the general licenses authorizing telecommunications-related transactions, including payment related to the provision of telecommunications involving Cuba or provided to Cuban individuals. Pursuant to this provision, U.S. persons may, for example, purchase calling cards for people to use in Cuba and/or may pay the bills of such people directly to a telecommunications operator located in Cuba, such as ETECSA. These steps to facilitate improved access to telecommunications services for Cubans and increased international connections are intended to increase the ability of the Cuban people to communicate freely and to better provide for efficient and adequate telecommunications services between the United States and Cuba. For a complete description of what this general license authorizes and the restrictions that apply, please see 31 CFR § 515.542.

Persons subject to U.S. jurisdiction may provide additional services incident to internet-based communications and related to certain authorized exportations and reexportations of communications items. The range of such services has been expanded to coincide with changes to Commerce Department regulations, and such services can now be provided for a fee to certain end users. For example, transactions incident to providing fee-based internet communications services such as e-mail or other messaging platforms, social networking, VOIP, web-hosting, or domain-name registration are now authorized in most circumstances. Services related to many kinds of software (including

applications) used on personal computers, cell phones, and other personal communications devices are also authorized, along with other services related to the use of such devices. Finally, services such as cloud storage, software design, business consulting, and the provision of IT management and support related to use of hardware and software exported or reexported to Cuba pursuant to the Commerce Department's Consumer Communications Device authorization is permitted. For a complete description of what this general license authorizes and the restrictions that apply, please see 31 CFR § 515.578.

### **VIII. Third-Country Effects**

#### **42. Are Cuban nationals located outside of Cuba still considered blocked?**

Yes, but any individual Cuban national who can establish that he or she has taken up permanent residence outside of Cuba and otherwise meets the requirements set forth in 31 CFR § 515.505 is generally licensed as an unblocked national.

#### **43. Can U.S.-owned or -controlled entities in third countries engage in trade/commerce with Cuban nationals located outside of Cuba?**

U.S.-owned or -controlled entities in third countries may provide goods and services to a Cuban national who is an individual located outside of Cuba, provided that the transaction does not involve a commercial exportation, directly or indirectly, of goods or services to or from Cuba. For a complete description of what this general license authorizes and the restrictions that apply, please see 31 CFR § 515.585.

#### **44. Are U.S.-owned or -controlled entities in third countries authorized to provide financial services to Cuban nationals located outside of Cuba?**

U.S.-owned or -controlled entities in third countries may provide financial services to a Cuban national who is an individual located outside of Cuba, provided that the transaction does not involve a commercial exportation, directly or indirectly, of goods or services to or from Cuba. For a complete description of what this general license authorizes and the restrictions that apply, please see 31 CFR § 515.585.

### **IX. Miscellaneous**

#### **45. What change has been made to the regulatory interpretation of “cash in advance”?**

The regulatory interpretation of “cash in advance” has been changed from “cash before shipment” to “cash before transfer of title and control” to allow expanded financing options for authorized exports to Cuba. For the full text, see 31 CFR § 515.533.