

## **Guidelines For University of South Florida Personnel Traveling to Cuba**

Revised November 2, 2022

Under Florida law, USF cannot pay or reimburse travel expenses for activities related to or involving travel to any country designated by the United States Department of State as a state sponsor of terrorism [see §§ [1011.90\(6\)](#), [112.061\(3\)\(e\)](#), Fla. Stat.].

The U.S. Department of State designated Cuba as a state sponsor of terrorism on 12 January 2021 (see <https://www.state.gov/state-sponsors-of-terrorism/>).

**Therefore, USF cannot pay or reimburse any travel expenses for travel to Cuba.**

However, USF employees may choose to personally pay travel expenses for travel to Cuba related to one or more of the authorized activities listed in 31 C.F.R. § [515.560\(a\)](#), including professional research and professional meetings in Cuba (see § [515.564](#)).

If an outside entity funds such travel, whether directly or by payment to a USF employee, then the USF employee must disclose this in [eDisclose](#) as an outside “financial interest” if they are engaged in the design, conduct, or reporting of any research at USF (see § [1012.977](#), Fla. Stat.).

Alternatively, some federally funded investigators may need to disclose such funding as a “significant financial interest” as part of [USF’s Conflict of Interest Program](#) depending on the source and amount of such funding.

Any USF employee who receives such funding who is not engaged in the

Permissible



**EXHIBIT A**

**TRAVEL CERTIFICATION: TRAVEL TO CUBA**

I understand that travel to Cuba and travel-related transactions must occur within the scope of the self-authorizing general license of travel to Cuba or under a specific license granted on a case-by-case basis. By signing my name below, I declare that I am traveling within the category of travel authorized for "Professional Research and Professional Meetings In Cuba" as defined in 31 C.F.R. § 515.564.

I am a professional associated with the University of South Florida whose travel transactions are directly related to my profession, professional background, or area of expertise. My travel is deemed Business Travel and I have obtained the necessary approved electronic Travel Authorization from my College or Unit. The research or meetings I am participating in, relating to my full-time professional area, will comprise a full work schedule in Cuba and I will not engage in recreational travel, tourist travel, or travel in pursuit of a hobby.

I understand that direct financial transactions involving an entity listed on the Cuba Restricted List or the Cuba Prohibited Accommodations List are strictly prohibited by the U.S. Department of State. As an agent of USF, I am responsible for complying with this provision. I understand USF cannot pay for or reimburse travel expenses for travel to Cuba.

Dates of travel \_\_\_\_\_

I certify the above information is true and correct.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_