AIG may only provide insurance to persons subject to U.S. jurisdiction that are traveling to Cuba if such persons are authorized under U.S. law. Travelers are authorized by the United States Department of the Treasury's Office of Foreign Assets Control (OFAC) through either (a) one of 12 general licenses or (b) issuance of a specific license.

All persons seeking insurance or other services from AIG in connection with authorized travel to Cuba, whether pursuant to a general or specific license, must provide AIG with an AIG Cuba Travel Certificate corresponding to the specific authorization for which they are authorized. Please read the criteria for the general license under which you plan to travel and then complete the AIG Cuba Travel Certificate.

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Note 1: Regulations issued on November 8, 2017 generally prohibit persons traveling under these travel authorizations from engaging in direct financial transactions with persons and entities designated on the Cuba Restricted List, available here: <u>https://www.state.gov/cuba-sanctions/cuba-restricted-list/</u>. This list includes hotels, stores, marinas and other entities. All authorized individuals traveling to Cuba should review this list and ensure that they are complying with these prohibitions. AIG is generally prohibited from paying claims related to transactions that violate this prohibition.

Note 2: Regulations issued on September 24, 2020 prohibit persons traveling under these travel authorizations from lodging, paying for lodging or otherwise making any reservation for or on behalf of a third party to lodge, at any property in Cuba that the Secretary of State has identified on the Cuba Prohibited Accommodations List (CPA List), available here: <u>https://www.state.gov/cuba-sanctions/cuba-prohibited-accommodations-list/cuba-prohibited-accommodations-list/cuba-prohibited-accommodations-list-initial-publication/</u>. These prohibitions do not apply to lodging-related transactions initiated prior to the date a property was added to the CPA List. As of June 15, 2022, there are over 400 properties on the CPA List which are prohibited. AIG is generally prohibited from paying claims related to transactions that violate this prohibition.

Note 3: Regulations issued on June 9, 2022 authorize travel-related and other transactions incident to travel to Cuba to attend or organize professional meetings or conferences in Cuba. Furthermore, OFAC authorized group people-to-people educational travel that takes place under the auspices of an organization that is subject to U.S. jurisdiction and that sponsors such exchanges to promote people-to-people contact, subject to certain restrictions. Travel-related transactions must be for the purpose of engaging, while in Cuba, in a full-time schedule of activities that are intended to enhance contact with the Cuban people, support civil society in Cuba, or promote the Cuban people's independence from Cuban authorities; and will result in meaningful interactions with individuals in Cuba.

1. <u>Section 515.561 – Family Visits</u>

Persons subject to the jurisdiction of the United States and persons traveling with them who share a common dwelling as a family with them are authorized to engage in the travel-related transactions \dots and such additional transactions as are directly incident to -

- visiting a "close relative" who is
 - o a national of Cuba;
 - a person ordinarily resident in Cuba;
- visiting a "close relative" who is a person located in Cuba pursuant to the authorizations in the Cuban Assets Control Regulations for:
 - o official government business (§ 515.562);
 - o journalistic activity (§ 515.563);
 - professional research (§ 515.564(a)(1));
 - o educational activities (31 CFR § 515.565(a)(1)-(4), (6));
 - o religious activities (§ 515.566);
 - humanitarian projects (§ 515.575); or
 - o activities of private foundations or research or educational institutes (§515.576);
- accompanying a "close relative" traveling to Cuba who is an authorized traveler to Cuba pursuant to the authorizations in the Cuban Assets Control Regulations for:
 - o official government business (§ 515.562);
 - o journalistic activity (§ 515.563);
 - professional research (§ 515.564(a));
 - educational activities (31 CFR § 515.565(a)(1);
 - o religious activities (§ 515.566);
 - humanitarian projects (§ 515.575); or
 - o activities of private foundations or research or educational institutes (§ 515.576).

For purposes of this certification, the term *close relative* of a person means any individual related to that 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.

Example. Your mother's first cousin is your close relative for purposes of this part, because you are both no more than three generations removed from your great-grandparents, who are the ancestors you have in common. Similarly, your husband's great-grandson is your close relative for purposes of this part, because he is no more than three generations removed from your husband. Your daughter's father-in-law is not your close relative for purposes of this part, because you have no common ancestor.

An entire group does not qualify ... merely because some members of the group qualify individually.

Nothing in this paragraph authorizes a direct financial transaction with an entity on the Cuba Restricted List or the lodging, paying for lodging, or making any reservation for or on behalf of a third party to lodge, at any property on the Cuba Prohibited Accommodations List.

2. <u>Section 515.562 – Official business of the U.S. government, foreign governments, and certain intergovernmental organizations.</u>

The travel-related transactions ... and such additional transactions as are directly incident to activities in their official capacities by persons who are employees, contractors, or grantees of the United States Government, any foreign government, or any intergovernmental organization of which the United States is a member or holds observer status, and who are traveling on the official business of their government or intergovernmental organization, are authorized.

An entire group does not qualify ... merely because some members of the group qualify individually.

3. <u>Section 515.563 – Journalistic activities in Cuba.</u>

The travel-related transactions ... and such additional transactions as are directly incident to journalistic activities in Cuba are authorized, provided that:

(1) The traveler is at least one of the following:

- (i) Regularly employed as a journalist by a news reporting organization;
- (ii) Regularly employed as supporting broadcast or technical personnel;

(iii) A freelance journalist with a record of previous journalistic experience working on a freelance journalistic project; or

(iv) Broadcast or technical personnel with a record of previous broadcast or technical experience, who are supporting a freelance journalist working on a freelance journalistic project;

and

(2) 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 ... merely because some members of the group qualify individually.

Nothing in this paragraph authorizes the lodging, paying for lodging, or making any reservation for or on behalf of a third party to lodge, at any property on the Cuba Prohibited Accommodations List.

4. <u>Section 515.564 – Professional research and professional meetings in Cuba</u>

(1) *Professional research*. The travel-related transactions ... and such additional transactions as are directly incident to professional research are authorized, provided that:

(i) The purpose of the research directly relates to the traveler's profession, professional background, or area of expertise, including area of graduate-level full-time study;

(ii) The traveler's schedule of activities does not include free time or recreation in excess of that consistent with a full-time schedule of professional research.

(2) *Professional meetings*. The travel-related transactions...and such additional transactions as are directly incident to attendance at, or organization of, professional meetings or conferences in Cuba are authorized, provided that:

(i) For a traveler attending a professional meeting or conference, the purpose of the meeting or conference directly relates to the traveler's profession, professional background, or area of expertise, including area of graduate-level full-time study;

(ii) For a traveler organizing a professional meeting or conference on behalf of an entity, either the traveler's profession must be related to the organization of professional meetings or conferences or the traveler must be an employee or contractor of an entity that is organizing the professional meeting or conference; and

(iii) The traveler's schedule of activities does not include free time or recreation in excess of that consistent with a full-time schedule of attendance at, or organization of, professional meetings or conferences.

Example: The making of a documentary film in Cuba would qualify...if it is a vehicle for presentation of the research conducted pursuant to this section.

Example: A musicologist travels to Cuba to research Cuban music pursuant to the general license for professional research...Others who are simply interested in music may not engage in travel-related transactions with the musicologist in reliance on this general license. For example, an art historian who plays in the same band with the musicologist would not qualify for the general license.

Note: A person does not qualify as engaging in professional research merely because that person is a professional who plans to travel to Cuba.

Note: Transactions incident to the organization of professional meetings or conferences include marketing related to such meetings or conferences in Cuba.

Note: Each person relying on the general authorization in this paragraph must retain specific records related to the authorized travel transactions. See §§ 501.601 and 501.602 for applicable recordkeeping and reporting requirements.

An entire group does not qualify...merely because some members of the group qualify individually.

Nothing in this section authorizes a direct financial transaction with an entity on the Cuba Restricted List or the lodging, paying for lodging, or making any reservation for or on behalf of a third party to lodge, at any property on the Cuba Prohibited Accommodations List.

5. <u>Section § 515.565 – Educational Activities</u>

(a) *Educational activities*. Persons subject to U.S. jurisdiction, including U.S. academic institutions and their faculty, staff, and students, are authorized to engage in the travel-related transactions set forth in § 515.560(c), that are related to:

(1) Participation in a structured educational program in Cuba as part of a course offered for credit by a U.S. graduate or undergraduate degree-granting academic institution that is sponsoring the program;

(2) Noncommercial academic research in Cuba specifically related to Cuba and for the purpose of obtaining an undergraduate or graduate degree;

(3) Participation in a formal course of study at a Cuban academic institution, provided the formal course of study in Cuba will be accepted for credit toward the student's graduate or undergraduate degree;

(4) Teaching at a Cuban academic institution related to an academic program at the Cuban institution, provided that the individual is regularly employed by a U.S. or other non-Cuban academic institution;

(5) Sponsorship of a Cuban scholar to teach or engage in other scholarly activity at the sponsoring U.S. academic institution (in addition to those transactions authorized by the general license contained in § 515.571).

(6) 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. This includes participation by a reasonable number of adult chaperones to accompany the secondary school students to Cuba.

(7) Sponsorship or co-sponsorship of noncommercial academic seminars, conferences, symposia, and workshops related to Cuba or global issues involving Cuba and attendance at such events by faculty, staff, and students of a participating U.S. academic institution;

(8) Establishment of academic exchanges and joint non-commercial academic research projects with universities or academic institutions in Cuba;

(9) Provision of 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;

(10) Provision of 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;

(11) The organization of, and preparation for, activities described in paragraphs (a)(1) through (10) of this section by employees or contractors of the sponsoring organization that is a person subject to U.S. jurisdiction; or

(12) Facilitation by an organization that is a person subject to U.S. jurisdiction, or a member of the staff of such an organization, of licensed educational activities in Cuba on behalf of U.S. academic institutions or secondary schools, provided that:

(i) The organization is directly affiliated with one or more U.S. academic institutions or secondary schools; and

(ii) The organization facilitates educational activities that meet the requirements of one or more of the general

licenses set forth in paragraphs (a)(1) through (3) and (6) of this section.

Note: The authorization in this paragraph extends to adjunct faculty and part-time staff of U.S. academic institutions. A student enrolled in a U.S. academic institution is authorized pursuant to paragraph (a)(1) of this section to participate in the academic activities in Cuba described above through any sponsoring U.S. academic institution.

Note: The export or reexport to Cuba of items subject to the Export Administration Regulations (15 CFR parts 730 through 774) may require separate authorization from the Department of Commerce.

(b) General license for certain people-to-people travel: Persons subject to U.S. jurisdiction are authorized to engage in people-to-people travel. The travel-related transactions set forth in § 515.560(c) and such additional transactions as are directly incident to educational exchanges not involving academic study pursuant to a degree program are authorized, provided that:

(1) The exchanges take place under the auspices of an organization that is a person subject to U.S. jurisdiction and that sponsors such exchanges to promote people-to-people contact;

(2) Travel-related transactions pursuant to this authorization must be for the purpose of engaging, while in Cuba, in a full-time schedule of activities intended to enhance contact with the Cuban people, support civil society in Cuba, or promote the Cuban people's independence from Cuban authorities;

(3) Each traveler has a full-time schedule of educational exchange activities that will result in meaningful interaction between the traveler and individuals in Cuba;

(4) An employee, paid consultant, or agent of the sponsoring organization accompanies each group traveling to Cuba to ensure that each traveler has a full-time schedule of educational exchange activities; and

(5) The predominant portion of the activities engaged in by individual travelers is not with a prohibited official of the Government of Cuba, as defined in § 515.337, or a prohibited member of the Cuban Communist Party, as defined in § 515.338.

(6) In addition to all other information required by § 501.601 of this chapter, entities sponsoring travel pursuant to the authorization in this paragraph (b) must retain records sufficient to demonstrate that each individual traveler has engaged in a full-time schedule of activities that satisfy the requirements of paragraphs (b)(1) through (5) of this section. Individuals may rely on the entity sponsoring the travel to satisfy their recordseeping requirements with respect to the requirements of paragraphs (b)(1) through (5) of this section. These records must be furnished to the Office of Foreign Assets Control on demand pursuant to § 501.602 of this chapter.

Example: An organization wishes to sponsor and organize educational exchanges not involving academic study pursuant to a degree program for individuals to learn side-by-side with Cuban individuals in areas such as environmental protection or the arts. The travelers will have a full-time schedule of educational exchange activities that will result in meaningful interaction between the travelers and individuals in Cuba. The organization's activities qualify for the general license.

Example: An individual plans to travel to Cuba to participate in discussions with Cuban artists on community projects, exchanges with the founders of a youth arts program, and extended dialogue with local city planners and architects to learn about historical restoration projects in Old Havana. The individual traveler will have a full-time schedule of such educational exchange activities that result in meaningful interaction between the traveler and individuals in Cuba. The individual's activities do not qualify for the general license for people-to-people travel because the individual is not traveling under the auspices of an organization that is a person subject to U.S. jurisdiction and that sponsors such exchanges to promote people-to-people contact. The individual's travel may qualify for the general license in § 515.574 (Support for the Cuban People) provided the individual meets all of its requirements.

Note to paragraph (b): An organization that sponsors and organizes trips to Cuba in which travelers engage in individually selected and/or self-directed activities would not qualify for the general license. Authorized trips

are expected to be led by the organization and to have a full-time schedule of activities in which the travelers will participate.

Note to paragraphs (a) and (b): Except as provided in paragraph (b)(6) of this section, each person relying on the general authorizations in these paragraphs, including entities sponsoring travel pursuant to the authorization in paragraph (b) of this section, must retain specific records related to the authorized travel transactions. See \$ 501.601 and 501.602 of this chapter for applicable recordsceping and reporting requirements.

Nothing in paragraph (a) or (b) of this section authorizes a direct financial transaction prohibited by § 515.209.

Nothing...authorizes the lodging, paying for lodging, or making any reservation for or on behalf of a third party to lodge, at any property on the Cuba Prohibited Accommodations List to the extent prohibited by § 515.210.

Transactions related to activities that are primarily tourist-oriented are not authorized pursuant to this section.

6. <u>Section 515.566 – Religious activities in Cuba.</u>

Persons subject to U.S. jurisdiction, including religious organizations located in the United States and members and staff of such organizations, are authorized to engage in the travel-related transactions ... and such additional transactions as are directly incident to engaging in religious activities in Cuba, provided that the travel-related transactions pursuant to this authorization must be for the purpose of engaging, while in Cuba, in a full-time schedule of religious activities.

Nothing in this paragraph authorizes a direct financial transaction with an entity on the Cuba Restricted List or the lodging, paying for lodging, or making any reservation for or on behalf of a third party to lodge, at any property on the Cuba Prohibited Accommodations List.

7. <u>Section 515.567 – Public performances, clinics, workshops, athletic and other competitions, and</u> <u>exhibitions</u>

(a) **Amateur and semi-professional international sports federation competitions.** The travel-related transactions...and such other transactions as are directly incident to participation in athletic competitions in Cuba by amateur or semi-professional athletes or athletic teams, or organization of such competitions, are authorized, provided that:

(i) The athletic competition in Cuba is held under the auspices of the international sports federation for the relevant sport;

(ii) The U.S. participants in the athletic competition are selected by the U.S. federation for the relevant sport; and

(iii) The competition is open for attendance, and in relevant situations, participation, by the Cuban public.

(b) An entire group does not qualify for the general license in paragraph (a) of this section merely because some members of the group qualify individually.

Nothing in paragraph (a) or (b) of this section authorizes a direct financial transaction with an entity on the Cuba Restricted List or the lodging, paying for lodging, or making any reservation for or on behalf of a third party to lodge, at any property on the Cuba Prohibited Accommodations List.

8. <u>Section 515.574 – Support for the Cuban People</u>

(a) The travel-related transactions... and other transactions that are intended to provide support for the Cuban people are authorized, provided that:

- (1) The activities are of:
 - (i) Recognized human rights organizations;
 - (ii) Independent organizations designed to promote a rapid, peaceful transition to democracy; or

(iii) Individuals and non-governmental organizations that promote independent activity intended to strengthen civil society in Cuba; and

- (2) Each traveler engages in a full-time schedule of activities that:
 - (i) Enhance contact with the Cuban people, support civil society in Cuba, or promote the Cuban
 - people's independence from Cuban authorities; and
 - (ii) Result in meaningful interaction with individuals in Cuba.

(b) An entire group does not qualify for the general license in paragraph (a) of this section merely because some members of the group qualify individually.

Note: 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) are examples of activities that qualify for this general license. However, in order to meet the requirement for a full-time schedule, a traveler must engage in additional authorized Support for the Cuban People activities.

Nothing in paragraph (a)(1)(iii) of this section authorizes a direct financial transaction with an entity on the Cuba Restricted List, with the exception of transactions on behalf of a non-governmental organization. Nothing in this section authorizes the lodging, paying for lodging, or making any reservation for or on behalf of a third party to lodge, at any property on the Cuba Prohibited Accommodations List.

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. 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' 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.

Example 3 to § 515.574: An individual plans to travel to Cuba, rent a bicycle to explore the neighborhoods and beaches, and engage in brief exchanges with local beach vendors. The individual intends to stay at a hotel that does not appear on the Cuba Restricted List (see § 515.209). The traveler's trip does not qualify for this general license because none of these activities promote independent activity intended to strengthen civil society in Cuba.

9. <u>Section 515.575 – Humanitarian projects.</u>

(a) Transactions, including the travel-related transactions... that are related to the humanitarian projects in or related to Cuba that are designed to directly benefit the Cuban people as set forth in paragraph (b) are authorized, 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.

(b) Authorized humanitarian projects. The following projects are authorized by paragraph (a) of this section: medical and health-related projects; construction projects intended to benefit legitimately independent civil society groups; disaster preparedness, relief, and response; historical preservation; environmental projects; projects involving formal or non-formal educational training, within Cuba or off-island, on the following topics: June 2022

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 § 515.208; and projects to meet basic human needs.

Example: A U.S. group of medical professionals that specializes in disease treatment wishes to support a community in Cuba by providing the latest techniques and literature in disease education and prevention directly to the Cuban people. Provided that the medical professionals in the group maintain a full-time schedule related to disease education and prevention, these activities qualify for the general license.

(c) An entire group does not qualify for the general license in paragraph (a) of this section merely because some members of the group qualify individually.

Nothing in this section authorizes the lodging, paying for lodging, or making any reservation for or on behalf of a third party to lodge, at any property on the Cuba Prohibited Accommodations List.

10. Section 515.576 – Activities of private foundations or research or educational institutes.

(a) The travel-related transactions ... and such additional transactions as 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 are authorized, 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.

Example: A private research foundation that produces essays on international relations issues wishes to send a team made up of its employees and consultants to Cuba to collect information for a current study of the relationship that countries in the Western Hemisphere have with European countries. Provided that all of the employees and consultants on the team maintain a full-time schedule of activities relating to the collection of information for the study, these activities qualify for the general license.

Nothing in paragraph (a) authorizes a direct financial transaction with an entity on the Cuba Restricted List or lodging, paying for lodging, or making any reservation for or on behalf of a third party to lodge, at any property on the Cuba Prohibited Accommodations List.

(b) An entire group does not qualify for the general license in paragraph (a) of this section merely because some members of the group qualify individually.

11. <u>Section 515.545 – Transactions related to information and informational materials.</u>

The travel-related transactions ... and such additional transactions as are directly incident to the exportation, importation, or transmission of information or informational materials as defined in § 515.332 are authorized, 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.

The travel-related transactions ... and such additional transactions as are directly incident to professional media or artistic productions of information or informational materials for exportation, importation, or transmission, including the filming or production of media programs (such as movies and television programs), the recording of music, and the creation of artworks in Cuba, are authorized, provided that the traveler is regularly employed in or has demonstrated professional experience in a field relevant to such professional media or artistic productions, and that the traveler's schedule of activities does not include free time or recreation in excess of that consistent with a full- time schedule.

Nothing in paragraphs (a) or (b) of this section authorizes a direct financial transaction with an entity on the Cuba Restricted List.

12. <u>Section 515.533 – Exportations from the United States to Cuba; reexportations of 100% U.S.-origin</u> <u>items to Cuba; negotiation of contracts.</u>

The travel-related transactions ... and such additional transactions as are directly incident to the conduct of market research, commercial marketing, sales or contract negotiation, accompanied delivery, installation, leasing, servicing, or repair in Cuba of items consistent with the export or reexport licensing policy of the Department of Commerce are authorized, 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.

The travel-related transactions ... and such additional transactions as are directly incident to the facilitation of the temporary sojourn of aircraft and vessels as authorized by 15 CFR 740.15 (License Exception Aircraft, Vessels and Spacecraft) or pursuant to other authorization by the Department of Commerce for authorized travel between the United States and Cuba, including travel-related transactions by persons subject to U.S. jurisdiction who are required for normal operation and service aboard a vessel or aircraft, as well as persons subject to U.S. jurisdiction who are required to provide services to a vessel in port or aircraft on the ground, are authorized, provided that:

(i) Such travel-related transactions are limited to the duration and scope of their duties in relation to the particular authorized temporary sojourn; and

(ii) The aircraft or vessel must be transporting individuals whose travel between the United States and Cuba is authorized pursuant to any section of this part other than the paragraphabove.

Nothing in this section authorizes the lodging, paying for lodging, or making any reservation for or on behalf of a third party to lodge, at any property on the Cuba Prohibited Accommodations List.

13. <u>Section 515.559 – Certain export and import transactions by U.S.-owned or -controlled foreign</u> <u>firms.</u>

Travel-related transactions ... and such other transactions as are directly incident to market research, commercial marketing, sales or contract negotiation, accompanied delivery, installation, leasing, servicing, or repair in Cuba of exports that are consistent with the licensing policy under paragraph (a) of this section are authorized, 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.

Nothing in this section authorizes the lodging, paying for lodging, or making any reservation for or on behalf of a third party to lodge, at any property on the Cuba Prohibited Accommodations List.