OFAC ALERT

Expanded Sanctions Against Cuba

September 29, 2026

The Office of Foreign Assets Control (OFAC) is issuing this alert to highlight increased sanctions risks associated with transactions involving Cuba for both U.S. and non-U.S. persons from new sanctions authorities and amended regulations, which enhance U.S. national security and foreign policy tools to counter the continued threat posed by the Government of Cuba.

Executive Order 14404 and Issuance of Cuba Sanctions Regulations

On May 1, 2026, President Trump signed Executive Order (E.O.) 14404, "Imposing Sanctions on Those Responsible for Repression in Cuba and Threats to the United States National Security and Foreign Policy." OFAC issued the Cuba Sanctions Regulations (CSR) (31 CFR part 516), which implement E.O. 14404, effective September 30, 2026.

Pursuant to E.O. 14404 and the CSR, Cuban and non-Cuban foreign persons determined to be involved in specified harmful activities related to Cuba face sanctions risk. Moreover, foreign financial institutions that conduct or facilitate significant transactions for or on behalf of any person whose property or interests in property are blocked pursuant to E.O. 14404 may be sanctioned. **Accordingly, foreign financial institutions should exercise caution when dealing with any person sanctioned under this authority.**

General License 1

On May 7, 2026, OFAC issued General License 1. GL 1 authorizes all transactions prohibited by E.O. 14404 where such transactions are otherwise authorized, by general or specific license, or exempt under the Cuban Assets Control Regulations (CACR) (e.g., certain family remittances and the delivery of food, medicine, or medical devices to Cuba). For more information on GL 1 and authorized humanitarian activity under the CSR, see FAQ 1253 and FAQ 1264.

Amendment to the Cuban Assets Control Regulations

E.O. 14404 and the CSR complement the longstanding Cuban Assets Control Regulations (CACR) (31 CFR part 515). OFAC amended the CACR, effective September 30, 2026, in furtherance of the President's foreign policy towards Cuba and as directed by National Security Presidential Memorandum-5, to further restrict certain previously permissible activities. For more information on how these Cuba sanctions program authorities interact, see FAQ 1252.

Below are key changes to the CACR in the September 30, 2026 amendment. For more information on the full scope of the amendment, please see OFAC's Frequently Asked Questions on Cuba Sanctions Program page and 31 CFR part 515.

New Restrictions on Cuba Travel

OFAC narrowed the CACR's authorizations for certain travel-related transactions. (See 31 CFR § 515.560(a) for the list of twelve authorized categories of travel-related transactions.)

Professional meetings. As of September 30, 2026, persons subject to U.S. jurisdiction are no longer authorized to attend or organize professional meetings or conferences in Cuba, as previously authorized under 31 CFR § 560.564(a)(2). OFAC issued a 30-day authorization to wind down (expiring October 30, 2026) certain travel and other transactions that were previously permitted by this general license.

Educational activities. As of September 30, 2026, educational Cuba-related travel by persons subject to U.S. jurisdiction must now be under the auspices of an organization subject to the jurisdiction of the United States and almost all travelers must be accompanied by a representative of the sponsoring organization. Accredited U.S. undergraduate or graduate-degree granting institutions, their students, and full-time permanent employees conducting certain educational activities, however, may travel without being accompanied by a representative from a sponsoring organization. Additionally, "group people-to-people educational travel," which was previously authorized under 31 CFR § 515.565(b), is no longer permitted. For those who have already completed at least one travel-related transaction (e.g., purchasing a flight) that would have previously been authorized by either 31 CFR § 515.565(a) or (b) prior to September 30, 2026, such travel remains authorized.

For additional information on travel-related authorizations, see FAQs 695 – 710 on OFAC's FAQs on Cuba Sanctions Program page.

Expanded Prohibition on Financial Transactions with Cuba Restricted List Entities

Persons subject to U.S. jurisdiction are now prohibited from engaging in both direct and indirect financial transactions with any entity or subentity on the Cuba Restricted List (CRL) (31 CFR § 515.209). Indirect transactions are transactions in which a person serves as an intermediary in a funds transfer between a CRL entity and another person. The CRL is managed by the U.S. Department of State and includes entities and subentities that are under the control of, or act for or on behalf of, or for the benefit of, the Cuban military, intelligence, or security services or personnel at the expense of the Cuban people or private enterprise in Cuba. See FAQs 734, 735, and OFAC's FAQs on Cuba Sanctions Program page for additional information on transactions involving CRL entities.

New Restrictions on U-Turn Transactions

Banking institutions may no longer process "U-Turn" transactions involving Cuba (31 CFR § 515.584(d)). Previously, banking institutions subject to U.S. jurisdiction could process transactions in which (1) Cuba or a Cuban national held an interest, and that (2) originated and terminated outside the United States, provided that the originator and beneficiary of those transactions were not persons subject to U.S. jurisdiction. As of September 30, 2026, OFAC removed this authorization. Banking institutions are now authorized to reject (instead of block) such transactions. See FAQ 757 for further information.

Restrictions on Bank Accounts for Independent Private Sector Entrepreneurs

Banking institutions are no longer permitted to open and maintain bank accounts for Cuban nationals who are independent private sector entrepreneurs. As of September 30, 2026, banking institutions that previously maintained accounts for such persons pursuant to rescinded 31 CFR § 515.584(h)(2) are required to block all such funds and accounts and report them to OFAC, unless separately authorized by OFAC. Access to blocked funds requires a specific license from OFAC. Banking institutions can still open and maintain bank accounts for other Cuban nationals located in Cuba for the purpose of receiving payment for transactions authorized pursuant to, or exempt from, the CACR.

OFAC encourages those who transact with Cuba to refer to OFAC's Cuba Sanction Program page, where you can find links to the CACR and CSR, OFAC guidance, and other resources to help advise if prospective transactions comply with sanctions. For activity that is not authorized or exempt, you may apply for a specific license from OFAC. Please see OFAC's License Application Page for information about the specific licensing process.

Additional Information

Cuba Sanctions Program

Cuban Assets Control Regulations (CACR) (31 CFR part 515)

Cuba Sanctions Regulations (CSR) (31 CFR part 516)

Frequently Asked Questions on Cuba Sanctions Program

National Security Presidential Memorandum-5