

July 5, 2004

Re: Interim final rule amending Cuba travel regulations
Office of Foreign Assets Control, U.S. Dept. of the Treasury
FR Doc. 04-13630 Filed 6-14-04

Chief of Records
Attn: Request for Comments
Office of Foreign Assets Control
Department of the Treasury
1500 Pennsylvania Avenue, NW
Washington, DC 20220

Dear Sir/Madam,

On behalf of Medical Education Cooperation with Cuba (MEDICC), I write to express concern and alarm at interim OFAC regulations that further restrict academic travel to Cuba by students and professors at U.S. colleges, universities and medical schools.

For seven years, MEDICC has organized licensed elective courses in Cuba for nearly 1,000 medical, nursing, public health and midwifery students and faculty from 115 medical universities in the United States. These programs are being shut down as I write, due to the new regulations issued by your office.

As you can see from the sampling of letters attached from 26 deans and program directors at some of the most prestigious medical education institutions in the country, they particularly value this program for its "close review of curriculum", "high academic standards", and "exceptional academic benefits", calling MEDICC "a model of international education" and an "educational curriculum unparalleled by any other international medical educational exchange".

MEDICC students and faculty spend four to six weeks in Cuba, where the full-time program of study offers classroom and fieldwork experience focusing on community-oriented primary care principles and practice in a resource-scarce setting. All students must be of high academic standing in their home school in the USA, from which they receive academic credit towards their degree for MEDICC coursework. In Cuba, they stay in dormitories on medical school campuses, not in hotels, where they meet and share with Cuban and other international students.

Students' written assessments of their MEDICC courses and their professors' follow-up are revealing: they clearly show that the greatest influence of this program on their future career plans is to encourage them to work at the community level, integrating prevention and health promotion into practice in medically under-served and immigrant populations in the United States. They also refer to the Spanish language component of the program, which better prepares them to work in increasingly multi-cultural patient care settings.

Such a powerful contribution to public health and medical education in the United States will be lost under the new restrictions, because:

- MEDICC is a non-governmental organization, not a degree-granting institution, and thus is no longer eligible for an academic travel license.
- MEDICC courses last four to six weeks, compatible with medical, nursing and public health school curricula, **which do not offer ten weeks abroad**, as required in your regulations.
- MEDICC offers courses to students enrolled in degree programs from 115 universities across the United States, not just in one university, as required.
- MEDICC takes 18 months to carefully plan each one of its elective courses, assuring that it meet the high academic standards that participating medical schools have learned to expect. Thus, a travel license limited to one year, as the interim ruling dictates, is not sufficient for serious program preparation.

On behalf of the Board of Directors of MEDICC, I urge you to rescind the new restrictions on academic travel to Cuba for students, professors and professionals in all fields. We believe it is the right of MEDICC participants to engage in serious academic study and exchange with colleagues in Cuba, and that the exercise of this right can only enhance the skills of our future health professionals and the health of people both in Cuba and the United States. We believe these considerations surely outweigh all others.

Sincerely,

Peter G. Bourne, MD, MA
Chair, Board of Directors

Encl.