

March 15, 2006

Secretary John Snow
Secretary of the Treasury
Washington, D.C.

Dear Mr. Secretary:

We are writing to express our profound objection to the new policy which has resulted in OFAC's denial of renewal of the licenses held by national churches and ecumenical agencies for religious travel to Cuba -- licenses which we have received for many years.

In the past year national denominational bodies and religious organizations received letters from the U.S. Treasury Department's Office of Foreign Assets Control (OFAC), denying the renewal of their travel licenses to Cuba. These letters indicated that our national church institutions and ecumenical agencies were not considered to be "religious organizations" in the meaning of the regulations. Individual local congregations, however, continue to be eligible for the general licenses. We have also been informed that this policy change was driven by "increased misuse of such licenses by large organizations."

OFAC tells us that our national religious institutions can apply for a restricted license for religious travel to Cuba, and some of our institutions have received this license. This license requires us to submit a list of no more than 25 people who will be eligible to travel to Cuba during the one-year license period. It also limits travel to one trip per quarter.

National Churches, their mission boards and their ecumenical agencies carry out their denominational mandate on matters of mission, education, and presence of the Church on a global scale. They provide resources and programmatic guidance to individual congregations that want to be participants in God's mission in Christ domestically and internationally, acting on behalf of their individual congregations throughout the country.

- ***We adamantly deny any claim that our institutions have misused these licenses.*** If other large religious institutions have done so, we call on you to address these institutions directly to correct this problem. But do not tar us with this brush and interfere with the legitimate mission activities of Churches.
- ***OFAC is inadmissibly interfering with and hindering the churches' mission.*** Relationship and fellowship are at the heart of our understanding of church life and mission. To hinder this activity is to strike at the heart of our religious identity and freedom. In addition, many small congregations, including many in minority communities, will be greatly disadvantaged by these new policy interpretations of OFAC and the U.S. government. These interpretations remove the ability of their denominational offices to assist them in mission activities beyond their neighborhoods. Many individual congregations lack the capacity and experience to navigate alone the complexities of governmental bureaucracy and cultural barriers that can impede their participation in international mission. Nor, under the new interpretation, will these congregations be able to participate in a mission to Cuba with fellow church members outside their local congregation.

- ***For OFAC to take it upon itself to decide which organizational level – local or national -- of the same Church qualifies for which kind of religious travel license is an insupportable intrusion by government into religious matters and far beyond OFAC’s competence.*** For some church denominations, local congregations are not independent entities, but represent the national church institution at the parish level. For others, congregations, regional, and national organizations are understood to be equal and interdependent expressions of the same church. OFAC’s policy favors one form of religious structure over another in a manner that is inappropriate for a governmental entity.

- ***The new policy has given rise to the perception that the U.S. government is discriminating against the mainline Churches in favor of religious groups whose activities may be more favored by current U.S. officials.*** At a time when there is a significant increase of religious activities in Cuba by those U.S. churches which have not traditionally been involved there, the new policy is hampering activity by our own institutions, which have enjoyed long-term relationships with Cuban Christians. If this is not the intent of the U.S. government, the best way to make this clear is to restore the unrestricted licenses to the national denominations and ecumenical agencies.

- ***The restricted licenses for which national churches are now eligible make it impossible for these bodies to serve the needs of their local congregations.*** The licenses applications must list up to 25 specific people that can travel under the license, and travel is limited to once a quarter. While national churches may know which of their own national staff may need to travel to Cuba during the license period, the new interpretation largely removes the possibility of travel by members of their local congregations. National churches generally do not know at the time of the license application which local congregations will request travel during the year. Furthermore, it is unrealistic to place a four-trip limit on church denominations with millions of members.

- ***In addition to the licensing issue, U.S. churches find it increasingly difficult to bring Cuban church leaders to the United States.*** Leaders previously permitted to travel to the United States to attend church gatherings, were denied visas during 2005. In some cases it is not at all clear why visas have been denied. In other cases, the obstacle is that OFAC now routinely denies visas to any official of the Cuban Council of Churches, regarding them as agents of the Cuban government and individuals “whose entry would be detrimental to the interest of the United States.”

But the Cuban Council of Churches is a decades-long partner of many of our churches. Our churches – not the U.S. government – should be able to select our international ecumenical partners. We reject the idea that its leaders are agents of the Cuban government and ask for you to provide proof of this allegation.

We respectfully call on the Departments of Treasury and State to end their discriminatory policy interpretation, reinstitute the previous policy and restore the licenses that national church bodies have utilized for many years. The current implementation of religious travel regulations curtails religious freedom, impairs

the ability of local congregations to participate in God's global mission and politicizes the outreach of the Church.

Yours truly,

Reverend John L. McCullough, Executive Director & CEO, Church World Service

Reverend Robert Edgar, General Secretary, National Council of Churches of Christ in the USA

The Most Reverend Frank T. Griswold, Presiding Bishop and Primate, The Episcopal Church

Reverend Mark S. Hanson, Presiding Bishop, Evangelical Lutheran Church in America

Reverend Dr. Stan Hasteley, Executive Director, Alliance for Baptists

Reverend Dr. M.L. Jemison, President, Progressive National Baptist Convention

Reverend Dr. Clifton Kirkpatrick, Stated Clerk of the General Assembly of the Presbyterian Church (U.S.A.).

Reverend A. Roy Medley, General Secretary, American Baptist Churches USA

Reverend Larry D. Pickens, General Secretary, General Commission on Christian Unity and Interreligious Concerns, The United Methodist Church

Reverend Cally Rogers-Witte, President, Wider Church Ministries, United Church of Christ

Reverend Dr. Tyrone Pitts, General Secretary, Progressive National Baptist Convention

Reverend David A. Vargas, President, Division of Overseas Ministries, Christian Church (Disciples of Christ)