

## Policy on International Travel

<b>Policy Title</b>	<b>Policy on International Travel</b>
<b>Policy #</b>	01.103.1
<b>Policy Owner</b>	Provost and Vice President for Academic Affairs, Vice President for Administration and Finance, and Vice President for Research and Economic Development
<b>Contact Information</b>	Questions regarding insurance: Risk Management Office at (401) 874-2591. Questions regarding sponsored projects and export control: Research and Economic Development Office at (401) 874-4576. Questions regarding student travel: International Education Office (401) 874-2395.
<b>Approved By</b>	Administrative Policy Committee
<b>Effective Date</b>	February 3, 2020
<b>Next Review Date</b>	No later than June 30, 2023
<b>Who Needs to Know About this Policy</b>	This policy applies to international travel by all staff, faculty, and students that is sponsored or coordinated by, funded in any part or manner by, or involves the granting of degree credits by the University of Rhode Island. This includes travel for business, academic or research, athletic, and/or student organization purposes.
<b>Definitions</b>	<p><b>High-Risk Locations.</b> Countries, regions, and/or cities having a U.S. State Department Travel Advisory of Level 3 or 4. The University’s International Travel Safety and Risk Committee may at times designate additional locations as “high-risk” based on an assessment of health, safety, and security concerns (for example, areas garnering a Centers for Disease Control and Prevention Travel Notice Warning Level 3.)</p> <p><b>International Travel.</b> Travel undertaken outside of the 50 United States, U.S. Territories or Possessions.</p> <p><b>International Travel Insurance.</b> Provides insurance coverage and services to University faculty, staff, trustees and volunteers while traveling internationally on University related and approved travel. Coverage is intended to provide the first line of service and protection to University travelers to include but not limited to, medical coverage, emergency and evacuation assistance, theft and crime assistance as well as personal and legal liability coverage. As of May 1, 2019, this insurance is at no cost to the insured.</p> <p><b>International Travel Review Committee (ITRC).</b> The university-established committee that is charged with evaluating the safety and security risks associated with international travel.</p> <p><b>Program Director.</b> The Program Director oversees the development and implementation of the program content and must travel with the group to ensure program delivery as well as oversee the health and safety of the students during the course of the program.</p>

**Program Manager/Coordinator.** The individual who coordinates and manages enrollment and business elements of one or more international programs for student participation but may not necessarily travel abroad with the student(s). If the Program Manager/Coordinator is also traveling abroad, that individual may be considered a Program Director.

**Reportable Incidents.** Emergency events involving death, abduction, missing students, life-threatening illness or injury, or sexual assault as well as theft of electronic devices, hacking incidents, theft of data files, or theft of technology in any form (including electronic or paper copies or scientific equipment). In addition, Reportable Incidents include any incidents deemed reportable by the Clery Act (codified at 20 U.S.C. § 1092(f), with implementing regulations in the U.S. Code of Federal Regulations at 34 C.F.R. 668.46).

**Restricted Travel.** The prohibition of travel to an international location.

**Travel Advisory Level.** The numeric risk ranking (1-4) assigned to a location by the U.S. Department of State. The levels are:

- Level 1 - Exercise Normal Precautions: This is the lowest advisory level for safety and security risk. There is some risk in any international travel. Conditions in other countries may differ from those in the United States and may change at any time.
- Level 2 - Exercise Increased Caution: Be aware of heightened risks to safety and security. The Department of State provides additional advice for travelers in these areas in the Travel Advisory. Conditions in any country may change at any time.
- Level 3 - Reconsider Travel: Avoid travel due to serious risks to safety and security. The Department of State provides additional advice for travelers in these areas in the Travel Advisory. Conditions in any country may change at any time.
- Level 4 - Do Not Travel: This is the highest advisory level due to greater likelihood of life-threatening risks. During an emergency, the U.S. government may have very limited ability to provide assistance to travelers. The Department of State advises that U.S. citizens do not travel to the country or leave as soon as it is safe to do so.

**Travel Registry Portal.** The University's electronic registry portal for International travel.

**Traveler.** An individual traveling internationally for any University-sponsored or University-related work or educational activity.

**University-Sponsored or University-Related Travel.** Credit-bearing education abroad programs, internships, research, service learning and volunteer opportunities, conferences, registered student organization activities, student groups affiliated with academic or athletic departments, and other non-credit-bearing University programs. Including but not limited to:

	<ul style="list-style-type: none"> <li>Any travel in connection with activities for which academic credit is sought, including programs operated through Office of International Education (OIE), travel as part of a formal academic program or course of study, internship credit, and travel for independent study credit (including retroactive requests for academic credit).</li> <li>Any travel for purposes of performance, sporting events, service learning, conferences, meetings, professional development or volunteerism organized by an academic department, a URI recognized student organization, or a student group affiliated with an academic department of the University.</li> <li>Any travel for which funding is sought through a University-administered account or a student government-administered account within URI.</li> </ul> <p>Any travel that requires prior approval and/or that requires international health insurance through a University-contracted insurance plan.</p>
<b>Statutes, Regulations, and Policies Governing or Necessitating This Policy</b>	<p>U.S. Department of Commerce Bureau of Industry &amp; Security - Export Control  U.S. State Department Travel Advisory  U.S. State Department Smart Traveler Enrollment Program  U.S. Office of Foreign Assets Control (OFAC)</p>
<b>Reason for Policy/Purpose</b>	<p>This policy establishes standards and expectations associated with international travel and outlines institutional support designed to reduce personal and institutional risk.</p>
<b>Forms Related to this Policy</b>	<p>None</p>

## Policy Statement

It is the policy of the University of Rhode Island to sponsor and support many activities of teaching, study, research, and service in a global context. To that end, the University continues to expand its global footprint, international engagement, and travel activities in accordance with the mission and objectives of the University.

All travel entails some degree of risk, with travel to some locations involving relatively higher levels of risk. The University sets forth standards and expectations in support of its educational mission and the health and safety of all community members.

## Due Diligence

International travel is best undertaken by well-informed travelers. Before planning international University-Sponsored Travel, individual travelers and Program Directors are responsible for due diligence regarding all locations in their itinerary. Before requesting International Travel Authorization, current U.S. State Department [Travel Advisory](#) information should be reviewed along with guidance from the U.S. Centers for Disease Control (CDC.) Travelers should also check U.S. Office of Foreign Assets Control (OFAC) sanctions and determine if Export Control requirements apply to their travel. <https://www.treasury.gov/resource-center/sanctions/pages/default.aspx>

Travelers must check with the International Travel Review Committee, the body charged with evaluating the safety and security risks associated with international travel for staff, faculty, and students, to ensure that travel is permitted by the University to the proposed location.

Prior to departure and throughout the course of travel, every person traveling is responsible for monitoring conditions in the location(s) they plan to visit. All international travelers are encouraged to enroll in the U.S. State Department's [Smart Traveler Enrollment Program](#) ("STEP") to obtain the most up to date information.

## University Travelers

### I. Students

**Individual Travelers:** Students who travel internationally for University activities, but not as participants in an education abroad or faculty-led program are required to enroll in the University-sponsored international travel insurance program. All student travel for University credit must be enrolled through the Office of International Education. Student travelers to countries with a U.S. State Department Level 3 (Reconsider Travel) advisory must obtain prior approval from the ITRC. The University does not permit student travel to countries with a U.S. State Department Level 4 (Do Not Travel) advisory.

Individual student Travelers with government security clearance must notify the URI Facility Security Officer (FSO) at least two weeks prior to travel.

**Program Participants:** Students traveling with a University education abroad or faculty-led program are required to enroll in the University-sponsored international travel insurance program. All student travel in these programs are administered through the Office of International Education. All education abroad and faculty-led programs traveling to countries with a U.S State Department Level 3 (Reconsider Travel) advisory must be approved by the ITRC. The University does not permit student travel to countries with a U.S State Department Level 4 (Do Not Travel) advisory.

### II. Faculty/Staff

**Individual Travelers:** Faculty and Staff who travel internationally on University business are automatically enrolled in the University-sponsored international travel insurance program and the travel registry portal when submitting a Travel Authorization Request.

Individual Travelers with government security clearance must notify the URI Facility Security Officer (FSO) at least two weeks prior to travel.

**Program Manager/Coordinators:** The Program Manager/Coordinator is responsible for securing the logistics of the travel, collecting the required information from the participants, delivering pre-departure orientation (health, safety, and risk management) for the students, and conducting follow-up activities. The Program Manager/Coordinator must be a faculty member or administrator in the University. For faculty-led education abroad programs, the Office of International Education (OIE) serves as the Program Manager/Coordinator in close collaboration with the faculty member who will serve as the Program Director. For international travel that is not a faculty-led or education abroad program, OIE will serve as a resource to Program Manager/Coordinators. The Program Manager/Coordinator may

at times also serve as the Program Director and must adhere to the Program Director requirements set forth.

Program Manager/Coordinators are required to:

- Verify in the 48 hours immediately preceding the sponsored travel that the U.S. Department of State has not issued any travel warnings or alerts related to the destination(s) to be visited;
- Provide emergency contact information (telephone numbers and email addresses) to all participants;
- Be available and on call at all times (24/7) in the immediate 48 hours before scheduled departure date(s) and during the sponsored travel to respond to participant concerns and problems as needed;
- Be familiar with and follow all existing University policy and procedures, including those on sexual harassment, confidentiality, and computer use and federal laws and regulations such as FERPA, HIPAA, and the Clery Act; and
- Conduct all appropriate follow-up activities, such as completing incident reports.

Program Directors:

The Program Director has responsibility for the development and implementation of the program content and, where applicable, curriculum. The Program Director is responsible for traveling with the group and ensuring that the program is delivered as planned. The Program Director is required to be present for the pre-departure orientation, to oversee the health and safety of the students during the course of the program, and shall be available to the students 24/7 during the program dates.

Program Directors are required to:

- Have a phone with working international call capacity at all times (24/7) and maintain a file with the health and medical information form for each participant;
- Be familiar with and follow all existing University policies and procedures including those on sexual harassment, confidentiality, and computer use and federal laws and regulations such as FERPA, HIPAA, Export Controls, and the Clery Act;
- Serve as the official University representative in cases of emergency to coordinate emergency response and communications between the international insurance carrier, the University, and all relevant persons and organizations;
- Notify authorities at the local site immediately in the event that one or more student participants cannot be accounted for or is missing;
- Ensure students receive medical attention by qualified professionals in case of a medical emergency, and
- Conduct all appropriate follow-up activities, such as completing incident reports.

## Travel Registration and Authorization

### Travel Portal Registration

The Travel Portal is the University's electronic registry for international travel and can be found on the University Risk Management website. The travel portal contains all traveler's itinerary and contact information to coordinate communication and emergency response efforts (such as sending and receiving alerts, warnings, and evacuation notices to travelers) for critical incidents abroad.

- **Faculty & Staff** who submit a completed Travel Authorization Request are automatically registered into the travel portal and enrolled in the international travel insurance.
- **Students** must register by enrolling in the international travel insurance found on the Risk Management website; and once enrolled, all information is transferred into the travel portal.

### **International Travel Review Committee**

The University of Rhode Island International Travel Review Committee (ITRC) is charged with evaluating the safety and security risks associated with international travel for staff, faculty, and students. The ITRC is chaired by the Vice Provost for Global Initiatives and includes the Risk Manager, the Emergency Management Director, a representative of the Office of International Education, a representative of the Division of Student Affairs, a representative from the Division of Administration and Finance, a representative from the Division of Research and Economic Development, and a member of the Faculty Senate. When appropriate, the Committee will also include representation from Athletics and/or other stakeholders at the Chair's discretion.

The Committee will meet regularly to review requests for International Travel Authorization according to a schedule set by the Committee Chair. The Committee may also be charged with other duties at the direction of the Provost, including annual review of risk levels of countries with which the University has partnerships and agreements to determine whether students and/or employees should be able to travel to those destinations in the near future.

### **Student Travel Authorization**

The University of Rhode Island International Travel Review Committee (ITRC) is charged with evaluating the safety and security risks associated with student (as well as faculty and staff) international travel. The committee is responsible for reviewing all proposed student travel to countries with a Level 3 U.S. State Department advisory; student travel to countries with a Level 4 U.S. State Department advisory is prohibited. The ITRC reserves the right to restrict, deny, or postpone any student University-sponsored international travel program or activity if the travel presents unacceptable risks to the health, safety, or well-being of students. When making its decision, the committee will consider information from multiple sources such as the U.S. Department of State, the U.S. Centers for Disease Control and Prevention, and other expert sources in providing relevant operational, legal, and risk management advice to travelers.

### **Faculty and Staff Authorization**

In accordance with the University Manual, Faculty members must obtain prior approval for all travel outside the U.S. and its territories from the appropriate dean or head of the division. Deans and/or heads of divisions shall ensure that authorization for travel does not exceed budget allocations.

When traveling abroad with students, the ITRC regulates the travel of faculty and staff to ensure consistent regulation of the safety and well-being of all students traveling abroad.

ITRC is also available for guidance to faculty and staff traveling to countries with a Level 3 U.S. State Department advisory, and the University strongly recommends Travelers seek ITRC guidance in these situations. Travel by faculty or staff to countries with a Level 4 U.S. State Department advisory is prohibited, though exceptions may be granted at the discretion of the URI president or provost, with guidance provided by the ITRC. Travel for sponsored projects may also be dictated by contractual terms that may require or prohibit international travel to certain countries.

## Emergency Response

The safety and well-being of all university members traveling abroad for university-related activity is of the highest importance and all reasonable actions will be taken to manage risks and respond to emergencies. Program Manager/Coordinators and Program Directors are required to make reasonable efforts to plan for emergencies and contingencies, consistent with professional standards for educational travel.

As emergencies can occur at any time, the University-sponsored travel insurance carrier is available 24/7 to respond to emergencies abroad including but not limited to medical emergencies, lost or missing persons, lost/stolen passports, evacuation efforts, legal assistance, and interpreter services. The international travel carrier is the first responder for all international emergencies and will coordinate with the traveler, the University, and any other agency required for assistance. It is critical that all University travelers enroll in the University-sponsored travel insurance to ensure coordinated response efforts in the event of an emergency.

The International Travel Review Committee (ITRC) in consultation with the University's insurance carrier is responsible for providing governance and directives for high level emergency and crisis situations (such as natural disasters, political and social unrest, medical emergencies, terrorism, etc.) as related to University-sponsored international programs. Should a higher U.S. State Department Travel Advisory Level be issued while a program is under way the ITRC may issue an instruction that all University staff, administrators, or students evacuate a given location or otherwise restrict activities when the committee determines that conditions in that location have changed and that continued presence in that location may endanger the health, safety, or well-being of participants.

### Emergency Role of Program Manager/Coordinators and Program Directors

Program Manager/Coordinators and Program Directors, under the guidance of the Office of International Education, are required to follow crisis management protocols (as provided by OIE) that take into consideration the following key issues:

- emergency response and rescue
- notification of participants' emergency contacts
- press and media communications
- legal and liability issues that may arise
- stress and psychological issues and effects resulting from an emergency event
- post-incident responses: arranging participants' return, medical treatment, follow-up information, and debriefing

Program Manager/Coordinators and Program Directors may, depending upon the nature of the incident, be required to:

- Contact local police or law enforcement to report theft, vandalism, or any other criminal activity
- Contact the local emergency medical provider for medical emergencies
- Contact the office of the provost and the office of the vice president of student affairs
- Contact the URI Department of Public Safety, particularly if a student is involved with the police abroad
- Report all injuries or illnesses to designated campus officials
- Complete any accident or incident reports within 24 hours and submit to the appropriate campus officials including the office of the provost and the office of the vice president of student affairs
- Be prepared to contact appropriate service providers

### Communication and Notification

The Program Manager/Coordinator must be able to reach the international program site contact person, faculty member for faculty-led programs, the director of the program at the host institution, or the director of the third-party program provider, at all times (24/7). The Program Director or contact person at the international site must have access to various forms of communication such as mobile phone, landline phone, email, fax, and in remote

locations, satellite phone (if available) in order to communicate with the University insurance carrier, home campus, and any other emergency responders as appropriate.

## Compliance

Faculty and staff who submit a Travel Authorization Request for all international travel are following this policy. Students who fail to follow the terms of this policy, including any University instructions to interrupt activities or evacuate from a location, may forfeit emergency travel insurance coverage, academic credit, tuition payments, or expense reimbursement and may be held responsible for additional expense incurred by the University due to the individual's refusal to follow this Policy. Students may also be subject to disciplinary action.

## Other

### Export Controls / Sanctions

Various import and export control laws may prohibit or restrict mobile devices (e.g., laptops, tablets, mobile phones) or any device that contains restricted encrypted software overseas. Travelers proposing to take University devices or devices with access to the university's systems overseas must comply with applicable laws and the University's Export Control Policy and make appropriate notifications as outlined in the Export Control Policy. Use of URI-owned "loaner" laptops is encouraged overall and is mandatory for any travel to countries with a Level 4 U.S. State Department advisory.

U.S. economic sanctions prohibit certain transactions with specified countries or individuals. University Travelers must be familiar with these prohibitions by seeking guidance from the U.S. Treasury, Office of Foreign Assets Control <https://www.treasury.gov/resource-center/sanctions/pages/default.aspx> as well as the URI Export Control Officer.

In accordance with federal law, no travel to U.S. sanctioned countries or business interaction with sanctioned entities may be conducted without approval from the U.S. Government and the University's Export Control Office. All travelers wishing to travel to countries or engage in business with entities subject to the administration and enforcement of U.S. economic embargoes and trade sanctions must review their travel plans with the Export Control Office and must provide the appropriate U.S. Government approval documentation.