## University of Denver - International Travel by Students, Faculty, and Staff

**Introduction.** The University of Denver is consistently a national leader among doctoral and research institutions in the percentage of undergraduate students who participate in study-abroad programs. We strongly invest in study abroad because it enriches the lives of our students and allows them to appreciate and understand the differences, complexities, and interdependencies that characterize our world. Study abroad helps shape the lives and careers of our students through intercultural development and language learning.

The University also offers countless opportunities for graduate students, faculty, and staff to travel internationally. Grants, fellowships, and other activities abroad allow for practical hands-on experience, professional development, research, and invaluable first-hand experiences. This enriches the lives of our graduate students, faculty, and staff helps them develop additional expertise in their chosen fields, enhances the University's reputation, and furthers the University's academic mission.

International travel is best undertaken by well-informed travelers. While international travel offers many opportunities, it also exposes travelers at any experience level to risk. Each country, and even regions within a country, has unique political, health, crime, and safety-related concerns. The threat of terrorist attacks, demonstrations, and other violent actions is not out of the question at any location. We want University travelers to benefit from international experiences, but we also want to help keep our travelers safe. With that in mind, the University provides the following to help you navigate University requirements concerning international travel, to help you become a well-informed traveler, and to encourage sound practices and safety measures that minimize risks to travelers and the institution.

**Contents**. These procedures are divided into ten sections, answering the following questions:

- 1. Who is covered by this document?
- 2. What do I need to do to move forward with my travel?
- 3. What laws do I need to know about when traveling internationally?
- 4. Am I required to participate in pre-travel orientation?
- 5. What can I do on my own to prepare for my international travel?
- 6. <u>Is it okay to travel with a family member or guest?</u>
- 7. What do I do if I experience an emergency while traveling abroad?
- 8. Does the University provide any insurance that covers me when I travel?
- 9. Are there resources available if I need help adjusting back to life in the US?
- 10. Who makes these rules?

## 1. Who is covered by this document?

The University of Denver supports and promotes travel by individuals whose academic or business activities involve international travel. Individuals and programs covered by these procedures include, but are not necessarily limited to, the following types of international travelers:

- University-run study abroad programs
- Study abroad programs involving partners of the University
- Unaffiliated student study abroad programs
- Faculty-led programs and student trips, including International Service-Learning (ISL) programs
- Faculty research and sabbaticals
- Graduate student research related to a degree program or on behalf of the University
- Faculty and staff handling University business
- Internships
- Student-led trips
- Travel that is required to fulfill degree requirements as established by academic units
- Travel for University athletic programs
- Travel that is funded by the University
- The University requires its students, faculty, and staff to follow these procedures when traveling outside of the United States for University-related academic or business matters.

These procedures do not apply to international travel that is not approved by the University. The University assumes no responsibility for or control over non-approved international travel. Individuals are not entitled to any academic-related or travel-related benefits, including credits or funding, during non-approved travel.

These procedures support University of Denver Chancellor-approved policy number 2.50.070 on University-related international travel by students, faculty, and staff. Additional procedures may apply to particular types of international travelers, such as study abroad programs and faculty-led travel. If there is a conflict between these procedures and other procedures, these procedures apply. Exceptions to these procedures are not desirable or anticipated, but may be necessary for unanticipated or very unusual circumstances. Any exceptions must be approved by the International Travel Committee ("ITC")<sup>1</sup> in writing.

<sup>&</sup>lt;sup>1</sup> See Section 10 for additional information about the ITC.

# 2. What do I need to do to move forward with my travel?

You need information on two topics to move forward with your travel – (1) travel approval and (2) travel registration. The *approval* and travel registration rules that apply to you depends on who you are and to, some extent, where you want to travel. Read on for more information concerning the following questions:

- a. Am I allowed to travel to more dangerous areas of the world?
- b. What are the approval rules for faculty, staff, and graduate students traveling as individuals?
- c. What are the approval rules for undergraduate travel?
- d. What if I want to travel to an area where the University discourages travel?
- e. Who is required to register before traveling internationally?

<u>a. Am I allowed to travel to more dangerous areas of the world?</u> The information in this section is critical to understanding how approvals are handled for different groups of University travelers. In the interest of the safety and well-being of students, faculty, and staff, the University strongly discourages student, faculty, and staff travel to "high" risk (undergraduates only) and "extreme" security risk destinations appearing on <u>DU's Higher Risk Destinations List</u>. This list is updated based on Level 3 and 4 <u>US State Department Travel Advisories</u> and <u>International SOS</u> travel security ratings of "high" or "extreme." Travel to such countries or regions is especially discouraged when viable alternatives are available.

Before registering in DU Passport as a student traveler or submitting a <u>Request</u> in Pioneer Travel and Expense as a faculty or staff traveler, review <u>DU's Higher Risk Destinations List</u>. The International Travel Risk Analyst<sup>2</sup> regularly updates the list with input from the ITC. Countries or regions appearing on the list are those subject to <u>US State Department Travel Advisories</u> Level 3 or 4, those with <u>International SOS</u> travel security ratings of "high" or "extreme," or other areas that the ITC deems unsafe for travel.

After determining whether an intended destination is subject to <u>DU's Higher Risk Destinations List</u>, review the requirements in the subsection below applicable to your current status at the University.

b. What are the approval rules for faculty, staff, and graduate students traveling as individuals? In the interest of academic freedom – except for regions of the world designated as an "extreme" security risk by the US State Department, International SOS, or other regions designated as extremely unsafe for travel by the ITC – there is no approval process through DU Passport for graduate students or Pioneer Travel and Expense for faculty and staff who wish to travel individually to any country or region of the world. However, faculty, staff, and graduate students must obtain approval in writing for travel from their Dean, manager, or other designated department or unit approver. Further, as prescribed in subsection (e) below, graduate students, must register all planned travel in DU Passport. And, as part of that registration process, individual faculty, staff, and graduate students wishing to travel to a country or region appearing on DU's Higher Risk Destinations List must provide a statement that demonstrates the need to travel to the country, approval of the travel by an appropriate person in the department or unit,

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<sup>&</sup>lt;sup>2</sup> See Section 9 for additional information about the International Travel Risk Analyst position.

and a clear acceptance of the risk involved. Faculty and staff must submit a Request in Pioneer Travel and Expense, and their supervisor must approve travel in the workflow process.

c. What are the approval rules for undergraduate travel? The first step is to determine whether your travel is part of a preapproved program, such as study abroad programs through the Office of International Education, DU Partner Programs, and faculty-led travel. Steps for obtaining approval of programs vary between departments. Travelers should check with the Office of International Education (study abroad) or their Dean, Dean's designee, or manager (for staff) for additional information. If planned travel is part of a preapproved program, register in DU Passport, as discussed in subsection (e) below.

If planned travel is *not* part of a preapproved program, and your intended destination does *not* appear on <u>DU's Higher Risk Destinations List</u>, follow these steps:

- Obtain approval in writing of the proposed travel from a Dean or other designated department or unit approver. Individual units may establish additional specific processes, workflows, and timelines for travel approvals, depending on the type of travel. Refer to materials within the appropriate department for additional information.
- Submit a completed online International Travel Approval Form in DU Passport, providing the following information:
  - The purpose of the travel and a description of activities at the destination
  - A copy of the signed approval document of the proposed travel from a Dean or other designated department or unit approver.

Once you receive confirmation that your travel has been approved in DU Passport, register in DU Passport, as discussed in subsection (e) below.

d. What if I want to travel to an area where the University does not allow travel? The following approval rules apply to two different groups of travelers, as follows:

- Faculty, staff, and graduate students traveling as individuals proposing travel to a country or region appearing on <u>DU's Higher Risk Destinations List</u> that is subject to an "extreme" security rating – the University does not approve of travel to such areas of the world and travel request reviews will be on a case-by-case basis.
- Undergraduate students and travel by groups of University students, such as faculty-led classes, whether comprised of graduate or undergraduate students, proposing travel to a country or region appearing on <u>DU's Higher Risk Destinations List</u> please note, though, that undergraduate travel and travel by groups of students is not permitted in countries or regions subject to an "extreme" security rating.

Proceed with the following steps *before* either registering the travel in DU Passport as a graduate student or submitting a Request in Pioneer Travel and Expense as faculty or staff, and at least two months in advance of the planned travel:

- Obtain approval in writing of the proposed travel from a Dean, manager, or other designated department or unit approver. Individual units may establish additional specific processes, workflows, and timelines for travel approvals, depending on the type of travel. Refer to materials within the appropriate department for additional information.
- Travelers must provide the following information graduate students should answer these
  questions in the International Travel Approval Form in DU Passport, and faculty and staff
  should answer these questions in an email sent to the International Travel Risk Analyst at
  risk@du.edu:
  - The purpose of the travel and a description of activities at the destination
  - An explanation why travel to the particular destination, rather than an alternate destination, is important to the field of study
  - An explanation why the applicant believes the travel will be safe, along with a
    description of the steps the applicant will take to avoid the risks of travel to the
    country or region
  - A clear acceptance of the risk involved
  - A copy of the signed approval document of the proposed travel from a Dean, manager, or other designated department or unit approver

The International Travel Risk Analyst will present the completed International Travel Approval information to the ITC for further consideration. The applicant may need to answer follow-up questions raised by the ITC and/or the International Travel Risk Analyst. The ITC will determine whether to allow the requested travel by evaluating whether the reason for travel to the particular destination outweighs the risk of travel to that destination. If travel is approved, the applicant and any other persons accompanying the applicant must sign a waiver and release form for travel to a country or region appearing on <a href="DU's Higher Risk Destinations List">DU's Higher Risk Destinations List</a>. In addition, travel may be subject to conditions established by the ITC. A failure to adhere to those conditions can result in the disallowance of funding or academic credit.

e. Who is required to register before traveling internationally? All students travelling internationally for University-related academic or business matters must first register the travel through the University's travel registration system, DU Passport, and all faculty and staff travelling internationally for University-related academic or business matters must first submit a Request in Pioneer Travel and Expense. Registration facilitates coordination of repatriation and evacuation travel benefits. For faculty and staff, registration also significantly aids in the handling of workers compensation claims. Failing to register travel, submit a Request in Pioneer Travel and Expense, or provide all relevant travel details before leaving the U.S. can result in the disallowance of funding or academic credit.

As part of the DU Passport registration process, all students must read and sign electronically within the DU Passport site the following forms:

- Risks and Responsibilities Agreement
- Legal and Policy Requirements

The University recommends that all travelers who are U.S. citizens or permanent residents also register travel with the <u>US Department of State Smart Traveler Enrollment Program (STEP)</u>. This will place the traveler's name on a consular listserv to receive time-sensitive updates from the local US embassy. Non-US citizens should inquire about similar services provided by their home government.

As part of the registration process, all travelers must certify that steps have been taken to comply with <u>US</u>
<u>Export Controls</u> requirements [see Section 3(c) below].

## 3. What laws do I need to know about when traveling internationally?

US law, as well as the freedoms protected by the US Constitution,<sup>3</sup> has limited application on an overseas program. **Host country laws are primary**. International travelers **must** understand and respect the laws and culture of the host country and the regulations of the program abroad. International travelers must understand that a violation of foreign laws can result in legal responses from the host country, including arrest and incarceration. In addition, a violation of foreign laws, University policies, or these procedures may result in disciplinary action by the University.

There are some US laws that may apply to activities in which persons engage while traveling internationally. Persons traveling for University-related academic or business matters, as well as their units, are responsible for ensuring compliance with all applicable US legal requirements. This section provides a brief overview of the following laws:

- a. Americans with Disabilities Act (ADA)
- b. Clery Act
- c. Export Controls
- d. Family Educational Rights and Privacy Act (FERPA) and Other Privacy Law
- e. Foreign Corrupt Practices Act (FCPA)
- f. Gender Discrimination
- g. Human Subjects Research
- h. OFAC and USA Patriot Act

For additional information and questions, contact General Counsel, the Office of Research and Sponsored Programs, or the International Travel Risk Analyst.

a. Americans with Disabilities Act (ADA). The ADA prohibits discrimination and guarantees that people with disabilities have the same opportunities as everyone else to participate in the mainstream of life in the US – to enjoy employment opportunities, to purchase goods and services, and to participate in government programs and services. The University encourages students with disabilities to take part in international travel or study programs that may enrich their total educational experience. Students with disabilities who meet program requirements and choose to study or travel abroad will encounter both opportunities and challenges. While the University can provide opportunities for international travel, the University cannot ensure that no discrimination will occur while traveling abroad – many countries do not even prohibit discrimination that would be illegal in the US. Reasonable accommodations vary greatly and depend upon individual needs, travel destinations, and academic activities. Students with disabilities

<sup>&</sup>lt;sup>3</sup> U.S. Constitutional freedoms, such as freedom of speech, the free exercise of religious beliefs, the right to assemble peaceably, prohibitions against unreasonable searches and seizures, and the right to a jury trial are not the law in other countries. Host country laws will apply and some or all of these freedoms may be nonexistent in the host country.

who are interested in international travel and study opportunities, along with staff and faculty involved in the planning process, should consider the following:

- Faculty, students, disability counselors, and international study program advisors should work together to determine accessibility of facilities, transportation, classroom needs, and reasonable accommodations.
- Anticipate and discuss socio-cultural and economic differences as they may affect the availability and implementation of some accommodations. Prearrange and coordinate necessary accommodations before arrival.

For additional information, contact University Disability Services at 303.871.2372 or <a href="mailto:dsp@du.edu">dsp@du.edu</a>.

b. Clery Act. The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act requires US universities that participate in Title IV federal student financial aid programs to disclose information about crime on and around their campuses, or in off-campus facilities. The Clery Act is named in memory of Jeanne Ann Clery, a Lehigh University freshman who was raped and murdered in her campus residence hall in 1986. A major intention of the Clery Act is to provide accurate and timely safety information to the public, parents, students and potential students about the level of crimes, and student alcohol and drug violations that occur on a campus. The Clery Act requires reporting of crimes in seven major categories: homicide, sex offences, robbery, aggravated assault, burglary, motor vehicle theft, and arson. In addition, there are reporting requirements related to liquor and drug law violations, illegal weapons possession, and hate crimes. While the Clery Act primarily applies to the University campus area, the law also imposes obligations to track and report on incidents occurring in some international situations. Contact Campus Safety at 1.303.871.2334 or use the DU Passport incident e-form to report an incident covered by the Clery Act or to obtain additional information about Clery Act requirements. When in doubt about the need to report an incident, contact Campus Safety.

c. Export Controls. The US regulates the transfer of information, commodities, technology, and software considered strategically important in the interest of national security, economic, and foreign policy concerns. A complicated set of laws and regulations, referred to as "Export Controls," governs exports. Export Controls regulate the shipment or transfer of "exports" out of the US, by whatever means, of things such as information, software, technology, or services. In general, Export Controls may cover and require a license for each of five main types of activities:

- Transferring controlled information, including technical data, to persons or entities outside the US
- Shipping controlled physical items, such as scientific equipment
- Verbal, written, electronic, or visual disclosures of controlled scientific and technical information
- Travel to certain sanctioned countries for teaching, presentation at conferences, or performing research
- Providing defense services

Check with the University's Office of Research and Sponsored Programs ("ORSP") for important information about research compliance and Export Controls. When travelling with a laptop, tablet or smartphone, be sure that it is not encrypted and does not contain information subject to Export Controls. Consult University Technology Services to discuss the availability of a "clean" laptop loaner. Consult ORSP with any questions about Export Controls compliance. Also refer to the University's Export Control/Trade Sanctions Policy<sup>4</sup>.

d. Family Educational Rights and Privacy Act (FERPA) and Other Privacy Laws<sup>5</sup>. Privacy laws such as FERPA may apply to activities of program leaders who hold important personally identifiable information about members of the group (e.g. social security numbers, passport numbers, dates of birth, addresses). This information is included as a part of protected student educational records under FERPA and cannot be released without a student's written consent. Program leaders should protect student educational records in their possession to the fullest extent possible. If student educational records are lost, immediately contact the Registrar's Office at 1.303.871.4095 and Campus Safety at 1.303.871.2334.

e. Foreign Corrupt Practices Act (FCPA). This law makes it unlawful to bribe a foreign government official to obtain or retain business. University employees should be aware of and act in compliance with the FCPA when conducting international business on behalf of the University. The fact that corrupt practices may be tolerated or acceptable in other countries does not relieve University employees of their responsibilities under the law. For further information, refer to the US Justice Department's "A Resource Guide to the US Foreign Corrupt Practices Act."

<u>f. Gender Discrimination</u>. Title IX of the Education Amendments of 1972 (Title IX) prohibits discrimination based on gender in educational programs that receive federal financial assistance. Title IX requirements apply to University-related international travel. Persons having a complaint of or concern with sexual harassment, harassment, sex discrimination, or sexual assault involving an incident occurring on University-related travel should immediately contact the University's Title IX Coordinator at 1.303.871.7420, at <a href="mailto:EqualOpportunity@du.edu">EqualOpportunity@du.edu</a>, or use the DU Passport incident e-form. Do not wait to raise a concern or file a complaint until returning to the University campus. By contacting the Title IX Coordinator immediately, the University can take steps to attempt to eliminate the harassment, prevent its reoccurrence, and address its effects.

g. Human Subjects Research. Federal law and University policies apply to research involving humans, including research conducted internationally. All projects conducted by University faculty, staff, and students that involve human subjects must be reviewed and approved by the University's Institutional Review Board (IRB) before engaging in the collection of any information from or about humans. Visit the

<sup>&</sup>lt;sup>4</sup> http://www.du.edu/bfa/media/documents/policy/ExportControl.pdf

<sup>&</sup>lt;sup>5</sup> The same considerations apply to the extent that a program leader might hold student health information protected under the federal Health Insurance Portability and Accountability Act ("HIPAA") or any other privacy laws, such as the federal Gramm-Leach-Biley ("GLB") Act.

IRB website for more information on requirements and processes. Contact the IRB Research Compliance Manager to discuss whether a project requires an IRB review.

h. OFAC and USA Patriot Act. The US Department of Treasury's Office of Foreign Asset Control ("OFAC") enforces economic and trade sanctions based on US foreign policy and national security goals against targeted foreign countries and regimes, terrorists, international narcotics traffickers, those engaged in activities related to the proliferation of weapons of mass destruction, and other threats to the national security, foreign policy, or economy of the US. The sanctions can be either comprehensive or selective, using the blocking of assets and trade restrictions to accomplish foreign policy and national security goals. The USA Patriot Act is often mentioned in conjunction with OFAC. This law has limited application to University travelers, but could come into play if an activity is perceived as money laundering involving a terrorist group.

## 4. Am I required to participate in pre-travel orientation?

<u>a. All International Travelers</u>. All persons travelling internationally must participate in pre-travel orientation. Depending on the circumstances and intended audience, orientation may be presented and completed electronically, in paper form, or in-person. Depending on specific academic program requirements, completing a registration in DU Passport or submitting a Request in Pioneer Travel and Expense often satisfies the pre-travel orientation requirement. Topics covered in the student DU Passport registration, in emails sent to faculty and staff who have submitted a Request in Pioneer Travel and Expense, or in any in-person orientation process may vary depending on the role of the person registering but will include information on the following for all travelers:

- Risks, conduct, and responsibilities while abroad.
- International SOS website, travel benefits, and benefits of and steps to arrange for pre-travel phone consultations with International SOS medical and security staff. (Note: All OIE undergraduate students must call International SOS for a travel consultation before engaging in any travel covered by these procedures.)
   Section 5(a) provides additional information on International SOS consultations.
- General immigration requirements and, when appropriate, additional destination-based immigration requirements.
- Benefits of and need for University access to emergency contact information.
- Health insurance abroad.
- Planning for good health and safety abroad.
- Application of the federal American with Disabilities Act to international destinations.
- Registration with the U.S. State Department Smart Traveler Enrollment Program (STEP).
- Workers' compensation coverage abroad (only for faculty and staff).

Academic programs may develop, and require the completion of, additional program-specific pre-travel orientation materials.

<u>b. Leaders of Group Programs</u>. All persons leading group programs must complete group leader pre-travel training. Depending on the circumstances, training may be completed in-person, electronically, in paper form, or in another form approved by the International Travel Risk Analyst. Topics covered in group leader training include responsibilities of group leaders, emergency management, and duty of care. Persons subject to this rule may be disqualified from leading a group if they fail to complete training to the satisfaction of the International Travel Analyst.

## 5. What can I do on my own to prepare for my international travel?

The University proudly supports its students, faculty, and staff who travel the world. Whether someone is a seasoned traveler or taking a first trip abroad, careful preparation and planning can lead to a safe and successful travel experience. Here are some pre-departure and risk awareness steps you can take to help make your journey a safe one:

- a. Contact International SOS for Advice and Information
- b. Prepare for the Unexpected
- c. Review Online Resources

a. Contact International SOS for Advice and Information. The University has a membership with International SOS, a medical and travel security services company. International SOS provides travel, medical, and security advice before and during travel, as well as emergency help, 24/7 worldwide. All University travelers engaged in full-time educational or research activities while traveling internationally are covered under the International SOS plan, at no additional cost.

The University's International SOS membership number is 11BSGC000067. Use this to login to the International SOS website or use when contacting International SOS by phone (in the US, the number is 1.215.942.8226). Travelers should carry the International SOS membership card while traveling. The card includes important contact information, including phone numbers for the four International SOS call centers. Obtain an International SOS card from the Office of Internationalization or print a card from the International SOS website.

Travelers can use the International SOS website to view country guides and online medical and security reports, and sign up for email alerts, which can provide helpful emergency information while traveling. Travelers can also call the International SOS Assistance Center at no cost for pre-travel information. A free International SOS phone consultation presents an opportunity to gain familiarity with the services available while traveling internationally.

Before calling International SOS, make a list of relevant questions about health, safety, and travel to countries where travel will occur. Suggested topics to cover include:

- Vaccination requirements and recommendations
- Traveling with prescription medications, including customs requirements
- Traveling with a pre-existing medical condition and physician recommendations
- Availability of needed medications at your destination
- Night-time safety precautions
- Current security situation
- Common safety concerns for travelers
- Tips to avoid common scams and petty theft

Please note that the International SOS plan is available only for University-related international travel. Persons traveling on personal matters before, in the midst of, or after University-related travel are strongly encouraged to purchase additional membership benefits at a personal cost to avoid any possible gaps in coverage. The International SOS website offers coverage at a discount off the normal rate when the University's membership number (11BSGC000067) is entered when logging into the site. This discounted coverage is also available for family members traveling with the student, faculty, or staff.

<u>b. Prepare for the Unexpected</u>. All University travelers should be prepared for possible emergencies and should outline an emergency management plan in advance of travel. Use this exercise as a pre-travel opportunity to research and document in a convenient and accessible location resources such as:

- International SOS contact information and DU's International SOS membership number;
- DU Campus Safety contact information;
- Contact information for local law enforcement;
- Contact information for the closest U.S. Embassy;
- A list of emergency contacts; and
- Information for local medical facilities.

International SOS and the University's International Travel Risk Analyst are helpful resources as you compile this information. Another good resource is the <u>Safety and Security Considerations for International Travelers</u> page, found on the Enterprise Risk Management website.

In addition, persons responsible for a group of travelers, such as program leaders, must develop a written emergency management plan in advance of international travel. Program leaders should also familiarize themselves with, and travel with, a copy of the University's Emergency Response Manual for International Travel. For ease and convenience, program leaders can use the form on the last page of the manual to create a written emergency management plan. If a program leader uses a different format, it should include all components found on the provided templated form. The International Travel Risk Analyst has the authority to withhold Enterprise Risk Management approval of group travel when a program leader fails to prepare a satisfactory written emergency management plan.

Contact the International Travel Risk Analyst for additional information. The International Travel Risk Analyst is an excellent resource for assistance in developing trip-specific emergency management plans.

In addition, the University has developed an internal crisis management plan that serves as a guide for University handling of emergencies involving University students, faculty, and staff whose academic or business activities involve international travel. For more information, contact the International Travel Risk Analyst.

- <u>c. Review Online Resources</u>. Here are some online resources that will help with your predeparture and risk awareness preparations:
  - <u>Disabilities Students Abroad U.S. Department of State</u>
  - Traveler's Checklist U.S. Passports and International Travel
  - Travelers' Health Centers for Disease Control and Prevention
  - <u>Traveler Information U.S. Transportation Security Administration (TSA)</u>
  - University of Denver Office of Internationalization International Travel

# 6. Is it okay to travel with a family member or guest?

The answer to this question is generally, yes, it is okay to travel with a family member or guest – however the answer does depend on your role as an international traveler. Please read on for more information.

<u>a. What are the General Rules for Traveling with a Family Member or Guest?</u> The following requirements apply to family members or guests accompanying any individual whose University academic or business activities involve international travel:

- Family members or guests cannot participate in academic program activities unless they are enrolled participants in the program or the program is designed to accommodate family members or guests.
- Accompaniment by family members or guests must not negatively impact a program or its participants and must not impair the operation and administration of program activities.
- Family members and guests are responsible for all expenses associated with their travel.
- Family members and guests must maintain health insurance that provides coverage while traveling internationally and must purchase their own evacuation and repatriation coverage through International SOS.
- Before travel, if requested, family members and guests must sign an assumption of risk and release of liability form.

<u>b. What are the Expectations for Faculty and Staff Leading an International Program?</u> The University discourages faculty and staff who are leading an international program from traveling with family members or other guests. This is because the faculty or staff member's primary duty of care is to the students with whom he or she is traveling. In the event of an emergency, a faculty or staff member could find himself or herself in the position of having to choose between the needs of the students or the family members or guests. Faculty and staff who are not leading an international program or who are travelling individually are not subject to this provision.

While the University prefers that program leaders not travel with family members or guests, in the event that such occurs, program leaders must be cognizant of and following expectations that apply to all program leaders:

- As a leader of the program, the instructor has responsibility to focus continuous attention on the health, safety, and security of program students and other program instructors.
- As a leader of the program, the instructor will not be able to provide care for family members or guests during the program and another individual unaffiliated with the program must assume full (24/7) responsibility for those duties. The University, its employees, and students cannot assume responsibility for the care of family members or guests.

#### 7. What do I do if I experience an emergency while traveling abroad?

Unfortunately, accidents happen; emergencies develop; and crises need to be addressed. Due to the unpredictability and varying circumstances of international travel, the University cannot guarantee a particular outcome or the safety of travel. The best thing you can do is be prepared in advance of an emergency. The first subsection will first discuss <u>contacting International SOS</u> in an emergency, with a <u>follow-up call to University Campus Safety</u>. The next subsection discusses <u>assistance that International SOS can provide</u> in an emergency.

<u>a. Contact International SOS and Campus Safety</u>. In the event of a medical or security emergency, travelers should contact International SOS for assistance. Call 1.215.942.8478 and have the University's membership number available – 11BSGC000067 – it also appears on the International SOS card.<sup>6</sup>

After contacting International SOS, contact University Campus Safety at 1.303.871.3000 as soon as possible.<sup>7</sup> Campus Safety will notify the University's International Travel Risk Analyst and other emergency back-up contacts, who will assist as possible in addressing the medical or security emergency. The University's International Travel Risk Analyst will apprise the ITC of all emergency contacts and will work with the ITC to address crises as appropriate.

<u>b.</u> Assistance that International SOS can provide in an Emergency. The International SOS plan goes hand-in-hand with an insurance policy through Nationwide Insurance. The insurance policy generally covers political, medical, and natural disaster evacuation and repatriation expenses authorized by International SOS. Please note that it is not a health insurance or medical expense policy. Subject to certain exclusions, this policy covers most evacuation and repatriation expenses, other than International SOS administration fees. Here are examples of services that International SOS can provide in an emergency:

- Health, safety, and security advice, including advice from an experienced, Western-trained doctor or security specialist
- Arrange for medical transportation or care, including evacuation to a center of medical excellence if local care is inadequate
- Locate a local doctor or other provider credentialed by International SOS medical staff
- Locate supplies of medication or equipment
- Obtain assistance due to the loss of travel documents or legal advice
- Advance funds to cover medical fees, when approved
- Monitor a traveler's medical condition and obtain advice

<sup>&</sup>lt;sup>6</sup> There will be times when the University takes proactive steps to assist travelers in the event of an emergency. However, whenever possible, travelers should always initiate immediate contact with International SOS, as circumstances may make it difficult for the University to contact travelers depending on the type of emergency.

<sup>&</sup>lt;sup>7</sup> If phone service is not available, but the Internet is still available, complete and submit a DU Passport incident eform.

# Contact a traveler's family

If a traveler needs medical care, the traveler should expect to pay for services personally while abroad, submitting receipts to the traveler's health insurer afterwards. If a medical facility will not accept a credit card or the traveler does not have enough cash to pay for services, International SOS will pay for the services and then bill the University. You or your unit will be responsible for reimbursing money advanced for services. Keep in mind that students may be able to pass all or some of the charges on to the student's health insurer. For University employees, whether the University covers the medical care depends on the circumstances and whether the employee was engaged at the time of the injury in activities related to University business. As such, employees must also maintain personal health insurance while traveling internationally.

International SOS sometimes charges administration fees for some services, such as advancing money for medical expenses. These expenses can run in the hundreds or even thousands of dollars, depending on the service provided. Students must reimburse the University for the full amount of any incurred administration fees, and the charges will appear on the student's University account. For University employees, the employee's unit is responsible for payment of the administration fees. Refer to DU Passport or the Enterprise Risk Management website for detailed information about International SOS administration fees.

The following exclusions apply to both the International SOS Plan and the Nationwide Evacuation and Repatriation Expense Policy. *This is only a general overview. The specific policy terms and applicable law* – <u>not</u> this overview – apply to any particular incident. Refer to DU Passport or the Enterprise Risk Management website for additional information. If you are injured or need assistance while engaging in any of the following activities while traveling abroad, you will not be entitled to benefits under the International SOS membership:

- Skydiving, hang gliding, parachuting, mountaineering (does not apply to school sponsored trips), any motorized speed race, bungee jumping, speed contests, spelunking or caving, heliskiing, or extreme skiing
- Participation in any war, invasion, revolution, or insurrection
- Piloting or learning to pilot or acting as a member of the crew of any aircraft
- Commission or the attempt to commit a criminal act
- Any non-emergency treatment or surgery, routine physical examinations, hearing aids, eyeglasses, or contact lenses

## 8. Does the University provide any insurance that covers me when I travel?

The following is a discussion concerning required and available insurance coverages while traveling internationally.<sup>8</sup> The following types of insurance will be discussed in this section:

- a. Health Insurance Personal Insurance Required
- b. Life Insurance
- c. Workers Compensation
- d. Kidnap and Ransom
- e. <u>Miscellaneous Coverages Insuring University Employees</u>
- f. <u>Traveler Personal Property Recommended</u>

<u>a. Health Insurance – Personal Insurance Required</u>. All travelers must maintain personal health insurance that provides coverage while traveling internationally. Part of the travel registration process includes a certification by each traveler that health insurance will be in effect. In some countries, proof of medical coverage is required to obtain a student visa. Travelers should research the type of coverage most appropriate to their destination. Program directors, faculty, and staff should not evaluate the coverage travelers have in effect, but leave this to the traveler's insurance carrier. The University's student health Insurance policy may cover a student traveling internationally, but students must check with the Health and Counseling Center for specific details related to their travel destinations. Please note that the plan with International SOS is <u>not</u> a health insurance or medical expense policy and is no substitute for a personal health insurance or medical expense policy. Travelers can also <u>purchase add-on medical expense coverage through International SOS</u> if they believe their personal health insurance is inadequate for international travel.

<u>b. Life Insurance</u>. With some life insurance plans, exclusions may apply for any country with an active US State Department Level 3 or 4 Travel Advisory or in war-torn areas. To ensure you have adequate coverage, travelers should contact their insurance carrier for specific details.

c. Workers Compensation. University employees acting within the scope of essential duties and injured while on the job traveling abroad are generally covered under the University's workers compensation insurance. However, this coverage expires after an employee is out of the state of Colorado for six months or more. Coverage can be extended if the University files a request with the State of Colorado before the expiration of the six-month period.

Under Colorado law, students participating in internships are also covered by the University's workers compensation insurance, so long as the University sponsors the internship and the student is taught through a coordinated combination of specialized in-school instruction and on-the-job training provided through a local business, agency, or organization or any governmental agency in cooperation with the University. This coverage is also subject to the six-month rule discussed above.

<sup>&</sup>lt;sup>8</sup> Please note that this is only a general overview. The specific policy terms and applicable law – not this overview – apply to any particular incident.

- <u>d. Kidnap and Ransom</u>. This coverage automatically applies to all University-related travel by employees, students, volunteers, and faculty on sabbatical. In the event of an incident covered by this policy, the University must immediately notify the insurer and its designated security consultant. The security consultant will then take necessary and appropriate steps to resolve the incident.
- <u>e. Miscellaneous Coverages Insuring University Employees</u>. University employees also have the benefit of coverage under the following policies while traveling internationally, including the requirement that injuries to another caused by an employee occur accidentally while the employee is engaged in activities related to University business:
  - Business travel accidental death and dismemberment up to \$50,000 in coverage and \$10,000 in medical expenses
  - General liability up to \$1 million in coverage for bodily injury and property damage to others
  - Foreign liability up to \$2 million in coverage for bodily injury and property damage to others
  - Excess liability up to \$100 million in additional coverage for bodily injury and property damage to others

Any incidents potentially covered under these policies must be reported within twenty-four hours of the incident to Campus Safety at 1.303.871.3000 and Enterprise Risk Management at 1.303.871.3810.

<u>f. Traveler Personal Property - Recommended.</u> Traveler personal property is not covered by University insurance. Travelers should ensure that homeowners or renter's insurance covers personal property, or purchase additional coverage appropriate to their needs and location. In addition, there is always the potential of a claim that is not covered by University insurance that could create personal exposure for a traveler – for instance, activities outside the scope of duties as a University employee, violation of University policies, and willful acts and crimes. A personal homeowners and umbrella liability policy can often provide protection when involved with non-University activities. Travelers should contact their personal insurer for specific details.

# 9. Are there resources available if I need help adjusting back to life in the US?

It is often difficult for international travelers to adjust back to life in the US after studying or traveling abroad. "Re-entry adjustment" or "reverse culture shock" are very common reactions. Persons who are having difficulties upon return should think back to the adjustments made to succeed while adjusting to life abroad. The coping skills and strategies that were successful then should be just as helpful in making the return home. If personal coping skills and strategies are not helping in adjusting back to life in the US, and feelings of depression or other mental health concerns are present, contact the University's Health and Counseling Center (HCC) at 303.871.2205. For after-hours mental health concerns, call 303.871.3000 and ask to speak with the counselor on-call.

#### 10. Who makes these rules?

The University's Department of Enterprise Risk Management and its Office of Internationalization are jointly responsible for the development and implementation of these procedures. The procedures were effective on September 29, 2015. This section provides additional information about the following that provide assistance in support of these procedures:

- a. International Travel Risk Analyst
- b. Office of Internationalization
- c. Office of International Education
- d. International Travel Committee
- e. Internationalization Council

<u>a. International Travel Risk Analyst</u>. The University's International Travel Risk Analyst provides support for University-related academic or business international travel by students, faculty, and staff. The International Travel Risk Analyst reports to the Director of Enterprise Risk Management, and has dotted line reporting to the Vice Provost for Internationalization and the University's International Travel Committee. The International Travel Risk Analyst's responsibilities include:

- Assessing and approving travel from a risk management perspective
- Monitoring international political and health matters to help ensure the safety of University travelers
- Serving as the University's contact for international travel-related crises and incidents
- Identifying students, faculty, and staff who may require emergency assistance or an evacuation, and facilitating the assistance or evacuation
- Developing crisis management and other emergency management plans as necessary, including a faculty-led travel crisis management manual
- Developing guidelines and procedures for international travel
- Developing standardized pre-travel orientation and training programs
- Managing content, processes, updates, and enhancements to the DU Passport application
- Serving as the University's contact for International SOS and other travel-related vendors
- Serving as a member of the International Travel Committee and leading the scheduling of and preparation of agendas for meetings

<u>b. Office of Internationalization</u>. The University's Office of Internationalization provides leadership and support for the University community by mobilizing international and intercultural resources locally and abroad, in cooperation with academic and administrative units. The offices and programs in Internationalization provide the knowledge and tools to shape responsible members of a community whose perspectives are local, regional, and international. In addition, the Office of Internationalization provides academic approvals for faculty-led travel and training for international travel programs.

<u>c. Office of International Education</u>. The University's Office of International Education (OIE/Study Abroad) is the home for DU's flagship study abroad program, Cherrington Global Scholars, along with International Community Engagement and Service Learning. It also offers support to any student seeking special help with study abroad to fit a special academic need.

<u>d. International Travel Committee</u>. The International Travel Committee (ITC) works with the International Travel Risk Analyst to develop guidelines and procedures for international travel. The ITC meets as necessary. Standing members of the ITC, all of whom are voting members, are:

- Director of Campus Safety
- Director of Enterprise Risk Management
- Director of the Office of International Education
- Executive Director of the Health and Counseling Center
- International Travel Risk Analyst
- Representative from the Daniels College of Business
- Representative from the Korbel School of International Studies
- Representative from the Office of Campus Life & Inclusive Excellence
- University Counsel
- Vice Provost of Internationalization

The Vice Provost for Internationalization and the Director of Enterprise Risk Management serve as cochairpersons of the ITC. The Director of the Office of International Education serves as the backup chairperson if neither of these individuals are available. The chairpersons and backup chairperson are empowered to take action, either individually or as a group, on behalf of the ITC and the University in the event of an emergency or urgent situation that does not allow ample time to convene an ITC meeting. When action in an emergency or urgent situation is taken, a report must be provided promptly to the entire ITC.

The ITC regularly analyzes safety, security, and medical conditions of newly proposed and already existing international travel opportunities in order to assess whether the risk of travel to a particular destination is acceptable for travelers and the University. The ITC carries out much of this work through emails between the International Travel Risk Analyst and ITC members. The ITC is an advisory arm of the University's Provost and Executive Vice Chancellor, and the Provost and Executive Vice Chancellor has final authority concerning ITC decisions.

In addition, the ITC manages the handling of responses to crises involving international travelers, including determining when evacuations of international travelers are necessary due to conditions such as political unrest, natural disasters, and health concerns. If the ITC determines that remaining at a location poses an unacceptable risk for any reason, the ITC may direct the traveler to leave the location. A failure to follow University policy, these procedures, or ITC directives can result in the disallowance of academic credit and/or funding.

In consultation with the appropriate faculty and/or staff, the ITC is empowered to establish specific program requirements or cancel a program or other international travel before departure or while in progress if facts and circumstances are such that the ITC concludes traveler safety may be in jeopardy. Before making any such decisions, the ITC will strive to obtain relevant input from affected faculty and/or staff. Financial loss resulting from any such cancellation is the responsibility of the affected traveler(s) and/or the University academic or business unit.

In consultation with the appropriate faculty and/or staff, it is the ITC's responsibility to determine instances when academic credit and/or funding is disallowed for failures to comply with University international travel procedures or failures to follow ITC directives.

ITC determinations resolved by a vote are not subject to a quorum requirement, so long as the voting members agree that opposing viewpoints have been represented and adequately vetted.

<u>e. Internationalization Council</u>. The Internationalization Council (Council) oversees and advises the Provost and Executive Vice Chancellor and the Vice Provost for Internationalization on all international and internationalization activities at the University. The Council is an important clearinghouse for perspectives from across the campus as the University embarks on increasingly ambitious international endeavors. The Council is charged with:

- Developing recommendations for policies, practices, and planning designed to promote the University's internationalization initiatives
- Reviewing and providing non-binding recommendations regarding institutional linkages with academic institutions abroad; this includes departmental, divisional, and University-wide partnerships
- Discussing and monitoring the internationalization components of the University's strategic plan and reporting on internationalization initiatives and efforts across campus

The Council's membership includes faculty and administrators from across the University, including the Office of Internationalization and any potential strategic partners.

Please contact the International Travel Risk Analyst at 303.871.7017 if you have questions or need additional information.