Campus Administrative Policy

Policy Title: International Travel Policy for Faculty and Staff Employees

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Functional Area: Academic and Faculty Affairs

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Applies to: University of Colorado Anschutz Medical Campus
University of Colorado Denver
University of Colorado South Denver Location

A. INTRODUCTION

This policy provides guidance for faculty and staff concerning University of Colorado Denver | Anschutz Medical Campus employees regarding related or sponsored international travel, whether by individual faculty or staff employees or faculty when accompanied by students. An employee is defined as anyone employed by the University of Colorado Denver or University of Colorado Anschutz Medical Campus including but not limited to staff, instructors, professors, and fellows. It also covers non-university travelers (such as volunteers, spouses and family members, or other unaffiliated travelers), and independent contractors accompanying university travelers and...
independent contractors. It outlines the obligations of faculty employees, who are overseeing student international travel when the faculty member/university employee does not accompany the student(s). This policy provides guidance to mitigate and manage risk for faculty and staff entailed inherent in international travel under the auspices of the University. Such travel includes all international travel related to the faculty or staff member’s professional responsibilities at the University, including travel pertaining to research, teaching, invited presentation, professional development, and all travel that includes supervision of students, residents, fellows or other trainees. (Note: Grant-funded international travel, where the grant is processed through the University of Colorado or the CU Foundation, is subject to this policy as well as to any regulations set by the granting agency.)

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C. POLICY STATEMENT

Faculty and Staff Employees are responsible for compliance with official University System and University of Colorado Denver | Anschutz Medical Campus international travel policies and with relevant federal, U.S., and foreign laws and regulations. This policy covers travel under the auspices of the University; it does not pertain to international travel that has no connection to the University, such as personal vacations.

1. TRAVEL AUTHORIZATION, REGISTRATION AND INSURANCE

a. Required Travel Authorization and Compliance

University of Colorado System Administrative Policy Statement (APS) 4024, Travel Authorization, requires that all University personnel employees traveling internationally secure department approval for official University business travel. International travelers are required to provide in-country contact information and other related data, purpose of travel, if export controlled information or equipment will be taken, estimated trip cost, main country destination, and dates of travel.

b. Procurement Requirements
Faculty and Staff Employees must also comply with the Procurement Procedural Statement and follow all Procurement Service Center (PSC) policies and processes regarding travel.

cb. Required registrations

(1) Registration with University International Assistance Provider, currently International SOS.

All international travelers-employees traveling internationally-under the auspices of the University are required to register with our international assistance provider, International SOS. This is a one-time process to create a...

When travel arrangements are made through the University's preferred travel agent, currently Christopherson Business Travel, the itinerary is automatically uploaded into the International SOS database. If the travel arrangements are made through any other source, faculty and staff who are employees traveling under the auspices of the University must forward their itinerary to CUTCtravel@itinerary.internationalsos.com or must manually add their travel itinerary into International SOS through "My Trips" prior to undertaking international travel. Registration with International SOS provides information that will enable the University to confirm coverage for international emergency medical & repatriation evacuation insurance as well as activate intervention services on the traveler’s behalf in the event of an emergency.

d. (2) Registration with State Department, U.S. Department of State

Prior to travel, University travelers who are (U.S. citizens only) should register with the State Department, enroll their travel through the U.S. Department of State’s web-based registration service, Smart Traveler Enrollment Program (STEP). Non-U.S. citizens should check with their respective governments for appropriate protocols.

c.e. Insurance for International Travelers (Employees)

The CU System University of Colorado provides international travel medical and evacuation and repatriation insurance to employees traveling on authorized University business. Information regarding resources is available on the University Risk Management International Travel webpage and the Procurement Service Center Travel webpage. Each University traveler is responsible for understanding his/her insurance coverage provided by the University. It is the responsibility of the traveler and their Department to understand the coverage provided and to determine whether appropriate supplemental any additional insurance is needed, such as international travel health...
insurance. Departmental or project funds, if available, may be used to pay for supplemental international travel health insurance.

2. INTERNATIONAL TRAVEL FOR NON-UNIVERSITY PERSONNEL UNAFFILIATED TRAVELERS

a. Non-University personnel Unaffiliated travelers accompanying university travelers

The university is not responsible for providing support or services to unaffiliated travelers. Prior to travel, all accompanying unaffiliated travelers (family members, friends, unaffiliated colleagues) must complete and sign the Travel Agreement, Notice of Risk and Waiver of Responsibility found on the University Risk Management website and send it to the International Risk Management coordinator, the employee’s international travel approver (e.g., supervisor or department head). There may be prohibitions on unaffiliated travelers in certain instances.

b. Non-University personnel Volunteers and independent contractors traveling internationally on university business

Unaffiliated personnel who are Volunteers or independent contractors on temporary assignment pertaining to university business must comply with all university international travel policies for the duration of their travel and must sign the Authorized Volunteer Agreement, Notice of Risk, and Waiver of Responsibility found on the University Risk Management website and send it to the International Risk Management coordinator prior to travel. The employee in charge of their travel.

3. TRAVEL TO HIGH-RISK COUNTRIES AND REGIONS WITH AN OFFICIAL TRAVEL WARNING/TRAVEL HEALTH WARNING

Faculty and staff Employees who travel abroad under the auspices of the university to countries designated by the University of Colorado System as high risk will be prevented from completing the international travel arrangements through the university’s designated travel agency until further vetting is completed by a sub-set of the International Risk Management Committee (IRMC) or Export Controls, and approval by university senior leadership. High-risk countries or regions are those that pose a significant risk to health or safety, or pose export controls concerns, must notify the Office of International Affairs of their intention to travel to countries and regions for which the U.S. State Department has issued an official and to countries for which the Center for Disease Control and Prevention has issued an official . Consult the for information and procedures. Once IRMC and/or Export Controls has vetted the travel, they will make a recommendation for travel approval/denial to the President or Chancellor or designee who will have the final decision regarding the international travel.
C.4. Travel to Office of Foreign Asset Control (OFAC) Sanctioned Nations

Faculty and staff who travel abroad must notify the Office of International Affairs of their intention to travel to an OFAC Consult for information and procedures.

4. EMPLOYEES AND STUDENTS ABROAD

All university employees who will be accompanied by university students on international travel or who mentor, supervise or advise student(s) on international travel must inform the Office of Global Education and comply with the International Travel Policy for Students (campus policy number 7015). All students engaging in an international experience through the university must comply with all Office of Global Education policies and procedures.

5. PROMOTING/ADVERTISING INTERNATIONAL LEARNING AND EXPERIENTIAL OPPORTUNITIES

Employees should take care not to promote learning and experiential opportunities involving international travel that have not been vetted by the university and that are not affiliated with the university. If faculty or departments do list these providers and opportunities on university web sites or by other means, they must include the following disclaimer:

"[THE PROGRAM] is operated by an organization independent from and not affiliated with or sponsored by the University of Colorado Denver | Anschutz Medical Campus. Students who choose to participate in [THE PROGRAM] do so with the understanding that the university does not oversee, operate or manage this program and will not be liable to the student, family, heirs, or assigns under any circumstances for anything which may arise during the course of this program or during independent travel that may occur after the program has ended."

6. LEGAL/REGULATORY, AND RESEARCH AND POLICY COMPLIANCE FOR INTERNATIONAL TRAVELERS

All university travelers are expected to comply with laws of foreign nations while traveling, working and transacting business abroad. Legal codes of foreign nations may differ from those of the U.S. and the traveler is responsible for compliance with these regulations.

a. Regulatory Compliance

a. Travel to Office of Foreign Asset Control (OFAC) Sanctioned Nations

Federal export and sanctions regulations prohibit the unlicensed export of specific commodities, software, technology and payments to or from certain countries, entities and individuals for reasons of national security, foreign
policy or protection of trade. University employees are required to comply with United States export and sanctions regulations when traveling abroad with commodities, software, and technology. When traveling with such items or information to countries of concern, embargoes or sanctions, travelers must notify the Office of Export Controls. All university travelers are required to comply with all export/import controls, regulations, restrictions and sanctions imposed by U.S. and international travel destination authorities. In some instances, violation of these regulations and restrictions entails high fines. All international travelers are responsible for compliance. For information contact the Office of Regulatory Compliance.

b. Human Subject Research Compliance

Any proposed human subject research study to be conducted by faculty, employees or students of the University of Colorado Denver | Anschutz Medical Campus (or one of the Affiliates) must be reviewed and approved by the Colorado Multiple Institutional Review Board (COMIRB) or an appropriate IRB designated by COMIRB even if the research will be conducted in another country. In addition, international human subject research must be determined to be culturally appropriate and in compliance with the laws and conventions of the foreign nation(s) concerned. Please For more information visit the COMIRB website.

c. Institutional Animal Care and Use Committee (IACUC) Compliance

Compliance with animal care and use protocols in international sites is the responsibility of the traveler. There may be requirements to comply with both university and U.S. regulations as well as a requirement to comply with regulations in the foreign nation. International transport of animals, animal parts, animal blood and fluids is subject to restrictions according to U.S. law and possibly the laws of other nations. Contact the IACUC for information.

C.6. Faculty Leading/Taking Students Abroad

All university faculty members who will be accompanied by University students on international travel must inform the Office of Global Education. Faculty leading/taking students abroad must ensure that students comply with all Global Education policies and procedures.

a. Faculty Compliance with Student Travel Policy

Faculty leading/taking students abroad must ensure that students comply with all -
b. Faculty Mentoring, Supervising and Advising Students’ International Travel and Activities

Faculty who mentor, supervise or advise students participating in international learning activities, but do not accompany students abroad, must comply with protocols designed to manage the learning, safety, and activity of the student. These protocols are established and administered by the Office of Global Education.

c. Faculty Compliance with Student Travel Policy

All university faculty members who mentor, supervise or advise University students’ international travel and activities must inform the Office of Global Education. Faculty must ensure that students comply with all Global Education policies and procedures.

d. Faculty Employee Compliance with Departmental and Program Protocols

Certain departments and programs have established protocols for participation in international internships, clinical rotations, practicum and other international learning or adventure experiences and academic departments. Faculty Employees should be aware of these and follow department- or program-specific protocols in addition to those outlined in this policy.

C.S. Provost Approval of Travel Restrictions and Related Required Actions

The Provost, in consultation with International Risk Management Committee and Office of University Counsel, determines any and all student restrictions or required actions pertaining to international travel. Only the Provost is authorized to post official notice of University travel restrictions.

a. Student Travel Suspension for Designated Countries and Regions

Faculty leading, accompanying, hosting, employing or on-site mentoring undergraduate or graduate students’ travel must be aware of the automatic suspension for student travel to countries with a travel warning and to Sanctioned Nations, which require a travel suspension appeal.

b. Appeals of Travel Suspension

Faculty leading, accompanying, hosting, employing or on-site mentoring undergraduate or graduate students’ travel to countries with a travel warning or to a Sanctioned Nation must prepare an appeal of the automatic travel suspension. The appeals form is required for all students traveling with a University faculty member or mentor.
C.0. Promoting/Advertising International Learning and Experiential Opportunities

Faculty should take care not to promote learning and experiential opportunities involving international travel that have not been vetted by the University and that are not affiliated with the University. If faculty or departments do list these providers and opportunities on university web sites or by other means, they must include the following disclaimer:

“The PROGRAM is operated by an organization independent from and not affiliated with or sponsored by the University of Colorado Denver | Anschutz Medical Campus. Students who choose to participate in THE PROGRAM do so with the understanding that the University does not oversee, operate or manage this program and will not be liable to the student, family, heirs, or assigns under any circumstances for anything which may arise during the course of this program or during independent travel that may occur after the program has ended.”

e. Consequences for Policy Violation

Employees or the employee’s department/unit who do not abide by this policy may incur, among others, fines, loss of funding, financial consequences resulting from an adverse event, or the inability to receive support services from the university in emergency situations. Employees may also be subject to human resources disciplinary processes.

Notes

1. Dates of official enactment and amendments:

   January 1, 2013: Adopted by the Provost
   June 6, 2018: Modified

2. History:

   June 6, 2018: Modified to reflect a Campus-wide effort to recast and revitalize various Campus policy sites into a standardized and more coherent set of chaptered policy statements organized around the several operational divisions of the university.

3. Initial Policy Effective Date: January 1, 2013

4. Cross References/Appendix:

   - Administrative Policy Statement (APS) 4024, Travel Authorization
   - Procurement Service Center Procedural Statement: Travel
   - University Risk Management International Travel
Administrative Note: All appendices were deleted and the URM website is now referenced whenever waivers are mentioned.