



**Campus Administrative Policy**

**Policy Title:** International Travel Policy for ~~Faculty and Staff~~ Official University Business Travel [HM1]

**Policy Number:** 1035      **Functional Area:** Academic and Faculty Affairs

**Effective:** ~~January 1, 2013~~ ~~April 1, 2020~~ July 1, 2021 (Pending)

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N/A (New) International Travel Policy for Faculty and Staff (January 1, 2013)

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**Reviewing Office:** Provost and Executive Vice Chancellor for Academic and Student Affairs

**Responsible Officer:** Provost and Executive Vice Chancellor for Academic and Student Affairs

**Applies to:** CU Anschutz  
CU Denver  
~~CU South Denver Location~~

**A. INTRODUCTION**

This policy provides guidance for faculty and staff concerning official university business travel under the auspices of the University of Colorado Denver | Anschutz Medical Campus, non-employee travel sponsored by the university, and travel by employees that is sponsored by another organization, related or sponsored international travel, whether by faculty or staff or faculty accompanied by students. [HM2][WJ3] CU CUI also covers non-university travelers (such as volunteers, spouses and family members, and independent contractors) accompanying university travelers. It also outlines the obligations of faculty individuals who are overseeing student international travel, when the faculty member 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~~ **the traveler's** professional responsibilities at the ~~u~~University, including travel pertaining to research, teaching, invited presentation, professional development, and all travel that includes supervisions 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~~ **Travelers** are responsible for compliance with official University System and CU University of Colorado Denver | CU 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 ~~u~~University; it does not pertain to international travel that has no connection to the ~~u~~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 Uuniversity personnel traveling internationally secure department approval for official Uuniversity business travel. International travelers are required to provide in-country contact information and other related data authorization for official university business travel in advance of the trip.~~

b. — Procurement Requirements

~~Faculty and Staff~~ **Travelers** must also comply with the Procurement ~~Procedural Statement: and follow all Procurement~~ Service Center (PSC) policies and processes regarding travel.

eb. Required registrations

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

All international travelertravelers [WJ5][SJ6] 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 international assistance provider's travel database. If the travel arrangements are made through any other source, faculty and staff who aretravelers traveling under the auspices of the University must forward their itinerary to CUTravel@itinerary.internationalsos.com or must manually add their travel itinerary into International SOS (membership number 11BCAS000006) through "My Trips" prior to undertaking international travel. Registration with International SOS provides information that will enable the University to confirm coverage for employee international emergency medical and& repatriationevacuation insurance [WJ7][SJ8] as well as activate intervention services on the traveler's behalf in the event of an emergency.

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

Prior to travel, University travelers who are (U.S. citizens or permanent residents only) should register with the State Departmentenroll 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.

ce. Insurance for International Travelers (Employees)[WJ9]

The CU System-University of Colorado provides international travel medical and ,evacuation, and repatriation- insurance to employees traveling internationally on authorized University business. Information regarding resources is available on the University Risk Management International Travel webpage at and the https://www.cu.edu/psc/travelProcurement 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 dDepartment [WJ10][WJ11]the unit to understand the coverage provided and to determine whether appropriate supplementalany additional insurance is needed. For non-employees, the University strongly recommends purchasing international medical and evacuation insurance for the trip. -Personal health insurance plans may not cover foreign

medical treatment, co-payments, co-insurance, certain evacuation needs or out-of-network charges.

, 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, the sponsoring unit should outline the associated risks of the activity on the **Travel Agreement, Notice of Risk and Waiver of Responsibility** and receive signatures indicating agreement from any and all accompanying unaffiliated travelers (family members, friends, unaffiliated colleagues). ~~must complete and sign~~ The template for the Travel Agreement, Notice of Risk and Waiver of Responsibility may be 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) should maintain these waiver forms for a period of five years <sup>[WJ12]</sup>. There may be prohibitions on unaffiliated travelers in certain instances.

<sup>[FP13][FP14]</sup> Dependents/Family Members of university employees approved for accompanying travel, should independently purchase coverage from the university's insurance plan.

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

~~Unaffiliated personnel who are~~ Volunteers or independent contractors <sup>[WJ15]</sup> 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 university employee in charge of their travel. These travelers must also secure international travel accident and evacuation insurance on their own as they are not covered by the University's plan for employees.

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

~~Faculty and staff who~~ Travelers wishing to travel abroad under the auspices of the University to countries designated by the University of Colorado CU 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 subset of the International Risk Management Committee (IRMC) or Export Controls, - and approved 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 Provost 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. ACCOMPANYING OR SUPERVISING STUDENTS ABROAD

All individuals 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 Campus Administrative Policy 7015, *International Travel Policy for Students*. 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

Caution should be taken when promoting learning and experiential opportunities involving international travel that have not been vetted by the Office of Global Education 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] this 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 nor during independent travel that may occur before or after the program has ended.”

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

All university international travelers traveling under the auspices of the university 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 international travelers 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, or where there are 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 CU Denver | CU Anschutz (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.<sup>[FP16]</sup>

#### **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 uUniversity 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.<sup>[FP17]</sup>



C.6. — Faculty Leading/Taking Students Abroad

~~All university faculty members employees 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 Education policies and procedures. 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.~~

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 [WJ18]

~~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 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.8. — Provost Approval of Travel Restrictions and Related Required Actions

[WJ19]

~~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.9. ~~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<sup>[SJ20]</sup>

~~International Individuals travelers or the individual's~~ sponsoring department/unit who do not abide by this policy may incur, among others, fines, loss of funding, financial consequences resulting from an adverse event, ~~university sanctions~~, 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

1 April 2020 (Pending): Revised



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<sup>[FP21]</sup>