



UNIVERSITY OF DENVER
POLICY MANUAL
RISK MANAGEMENT FOR INTERNATIONAL
TRAVEL

Responsible Department: Office of Enterprise Risk Management

Recommended By: Vice Provost for Internationalization, Executive Director for Enterprise Risk Management, and Senior Vice Provost for Research and Graduate Education

Approved By: Chancellor

Policy Number
RISK 2.50.070

Effective Date
4/3/2024

I. INTRODUCTION

- A. The University has long supported international travel to conduct research, study cultures, and languages, promote collaboration with peer institutions, and for other academic and administrative purposes dedicated to the public good.
- B. This Policy provides requirements and information for planning international travel, outlines the University's expectations for each kind of traveler, and summarizes the resources available to those traveling as part of their University role or program to facilitate safe and successful travel. The University of Denver (DU) divides international travel into two categories: DU Travel and non-DU Travel.
- C. Due to the unpredictability and varying circumstances of international travel, the University is committed to taking measures to support safe international travel by its employees and students. Among these measures are requirements for registering one's travel, being up to date with all required vaccinations, and complying with any applicable federal and state laws, including but not limited to economic and trade sanctions enforced by the Office of Foreign Assets Control.

II. POLICY OVERVIEW

- A. All employees and students intending to travel internationally for University business and academic-related purposes must:
 - Have registered in the applicable online system DU Passport or Pioneer Travel and Expense.
 - Be up to date with all immunizations required by any applicable, separate University policy and the traveler's destination country, and

any University vendor who is providing services that make the abroad experience possible, as demonstrated by proof of vaccination uploaded to the individual's [MyHealth](#) portal at least two (2) weeks before departure.

- Follow the University's elevated-risk international travel processes and requirements set forth below.
- Comply with all federal, state, and local laws and regulations, including the Export Control requirements set forth below.
- Comply with all host country laws and regulations .

Attached to this Policy as **Appendix 1** is a quick reference chart of the requirements for International Travel.

B. DU Travel means International Travel that falls into one or more of these categories:

- Funded entirely or in part by University funds.
- Organized primarily by the University (e.g., the University selects the participants).
- Conducted for University business and/or academic-related programs.
- Related to scholarly activities, whether paid for by the University or not.
- Requires the use of University equipment, supplies, or personnel.

C. Non-DU Travel means International Travel that is not related to University business or academic-related programs, for which the University assumes no control or responsibility, including the following examples:

- Personal travel, such as vacation travel or student travel home.
- Engagement with an unapproved study abroad program or internship for personal enrichment, even if academic credit may later be applied.

Non-DU Travel is not subject to this Policy.

III. PROCESS OVERVIEW

A. Registering Travel

Registering DU Travel is a safe and secure way to share one's travel itinerary and contact information so that the University can more easily locate and contact travelers and provide resources if there is an emergency or developing emergency. The methods for registration vary based on the individual's affiliation with the University:

1. Employee travel

- a. All employees must book travel through Pioneer Travel and Expense or by contacting Christopherson Business Travel directly, except that employees may directly book conference accommodations

when the directly booked rate is less than the published rate. Information on how to book travel can be found [here](#): under "Frequent Travelers">>International Travelers>>[Pioneer Travel & Expense](#)

- b. Individuals who are not required to book travel through Pioneer Travel and Expense or Christopherson Business Travel must still register their travel in DU Passport at <https://abroad.du.edu/>.
2. Student travel(experiential travelers and students on faculty-led programs):
 - a. All travelers must register in DU Passport at <https://abroad.du.edu/> at least one (1) week prior to departure, except if the individual is traveling to an elevated-risk destination, in which case they must register at least four (4) weeks prior to departure to allow sufficient time for review pursuant to this Policy.
3. Student travel (Office of International Education (OIE) or Undergraduate Academic Programs (UAP)):
 - a. Students who apply and commit to participate in programs run by OIE or UAP do not need to take additional steps to register prior to departure because they are registered through the application process.

Because Non-DU Travel is not subject to this Policy, there is no requirement to register such travel.

B. Travel to elevated-risk destinations

1. Elevated-risk destinations are any destinations that the University deems to be of high or extreme risk after considering, among other security and health factors: (1) advice from DU's travel assistance company; (2) the U.S. Department of State Travel Advisories; and (3) the CDC's Travel Health Notices. The University publishes a list of elevated-risk destinations on the Risk Management website, available at <https://www.du.edu/international-travel/higher-risk-destinations>, and updates the list regularly. All travelers must review this list prior to departure to determine whether their destination is on the list.
2. Employee international travel (without students):
 - a. Employees may conduct DU Travel to any country provided that they (1) register such travel consistent with this Policy; and (2) obtain necessary approval(s) of the travel as essential pursuant to University procedures.
 - b. Units/supervisors may consult with International Travel Health and Safety (ITHS) (contact: intlsafety@du.edu) as needed regarding such approval decisions and/or developing unit-level procedures.

3. Employee international travel (with students):
 - a. Employees conducting DU Travel with students to any destination must (1) register such travel consistent with this Policy; and (2) seek approval from the International Travel Committee (ITC) through the Short-Term Program process (<https://www.du.edu/international-travel/short-term-programs>). If the proposed travel is to an elevated-risk destination, ITC may require additional information and review.
4. Student international travel (undergraduate):
 - a. Undergraduate experiential travelers (e.g., independent travelers conducting research, attending a conference, or on non-affiliated programming) who wish to travel to a destination.
 - i. that the University has not deemed elevated-risk at the level of "High" must register such DU Travel consistent with this Policy, but do not need to seek approval from the ITC.
 - ii. that the University has deemed elevated-risk at the "High" level must (a) register such DU Travel consistent with this Policy; (b) answer additional questions during the travel registration process; and (c) seek approval from the ITC.
 - b. Undergraduate experiential travelers are not permitted to travel to any destination that the University has deemed to be of "Extreme" risk.
5. Student international travel (graduate):
 - a. Graduate experiential travelers who wish to travel to a destination that:
 - i. the University has not deemed elevated-risk at the level of "Extreme" must register such travel consistent with this Policy, but do not need to seek approval from the ITC.
 - ii. the University has deemed elevated-risk at the level of "Extreme" must (a) register such travel consistent with this Policy; (b) answer additional questions during the travel registration process; and (c) seek approval from the ITC.
6. Students participating in OIE or UAP programs are pre-approved to travel because the University reviews these programs on a case-by-case basis before making an approval decision for a program.
7. Students traveling on faculty-led programs are pre-approved to travel because the University reviews these programs on a case-by-case basis after Program Leaders submit a required [program proposal](#) in [DU Passport \(www.abroad.du.edu\)](#).
 - Note: If an elevated-risk alert is issued for a destination while a traveler is in that destination, the traveler may be required to leave the destination at their own expense.

C. Taking Students Abroad

1. All Program Leaders for Faculty/Staff-led University group travel programs must follow the steps set forth below to facilitate reduction of risks and to provide sufficient time for training, review for conflicts of interest, and selecting and entering agreements with vendors.
 - a. Summary of the Proposal Process:
 - i. The complete process for submitting a proposal and seeking approval can be found here: <https://www.du.edu/international-travel/short-term-programs>
 - ii. Program Leaders must submit proposals to the International Travel Committee (ITC) for conditional approval by the following deadlines:
 - at least nine (9) months before travel for any new program or existing program with substantial changes, such as new destination, new vendor, and/or new adventure activities (e.g. white-water rafting, surfing, or any other experience that has potential to be risky or dangerous).
 - at least six (6) months before travel for any program that ITC previously approved and that does not have substantial changes with respect to the risk assessment of the destination(s) or the other logistics of the program.
 - iii. Program Leaders must seek final approval by submitting a final proposal to ITC no later than one (1) month before travel but no earlier than two (2) months before travel.
 - iv. ITC will only consider proposals submitted after these deadlines on a case-by-case basis if the Provost supports ITC's consideration of the late proposal.
 - b. Additional Actions/Requirements:
 - i. ITC can withdraw approval at any time if ITC determines that the circumstances surrounding the program have substantially changed with respect to the risk assessment of the destination(s) or the other logistics of the program.
 - ii. A minimum of two (2) University employees must accompany a group of students on DU Travel and be responsible for supervising the group. If the group includes more than twenty (20) students, an additional employee must accompany the group to maintain a 10:1 student to employee ratio.
 - iii. All Program Leaders must complete an online pre-departure training at least once every calendar year in which they accompany students abroad. Program Leaders may consult with the ITHS for additional guidance.

D. Motorized Vehicles

Due to the high risk of injury, the University prohibits students while on DU Travel from (1) operating any motorized-vehicle (e.g., cars, trucks, vans, motorcycles, mopeds, motorized or electronic scooters, motorized bicycles, electric bikes, Segways, or jet skis); and (2) riding on any of the following motorized vehicles: motorcycles, mopeds, motorized or electronic scooters, motorized bicycles, electric bikes, Segways, or jet skis. Students may seek exceptions to this prohibition by contacting International Health & Safety (in the Office of Enterprise Risk Management) at intlsafety@du.edu. International Health & Safety will consider such exceptions on a case-by-case basis.

E. Insurance and Travel Assistance

The University has entered into contracts with vendors that provide urgent and emergent medical insurance (e.g., non-routine and not ongoing care), medical evacuation, political/security/natural disaster evacuation, repatriation, risk intelligence, and a variety of other travel-support services. University travelers may be eligible for coverage and services through the University's vendors at no cost to them or the sponsoring unit. However, the University and the vendors make such services available at their discretion and subject to certain limitations. For more information about these vendors, the services they provide, and limitations on the availability of services, please review <https://www.du.edu/international-travel/insurance-abroad> and <https://www.du.edu/risk/international-sos>.

1. By offering these resources, the University does not guarantee access to, response from, or any specific capabilities from these vendors. The vendors' ability to provide services depend on the circumstances and nature of the incident and the traveler's needs.
2. If a traveler requires additional coverage, the traveler must obtain such coverage at their own expense.

F. Export Control

All University travelers must comply with University Policy ORSP 1.10.070 – *Export Control* when engaging in International Travel.

1. All travelers must understand those restrictions placed on travel to sanctioned countries by the Office of Foreign Assets Control (OFAC) at 22 CFR 126.1. Any International Travel to a Destination identified in 22 CFR 126.1 must be approved by the University's Export Control Officer.

2. The sharing of goods, hardware, software, materials or services (collectively “items”) in a foreign destination is an export and may be subject to the U.S. Export Control laws, including but not limited to the Arms Export Control Act (22 U.S.C. § 2751 et seq); Export Administration Regulations (15 C.F.R. § 730 et seq); International Traffic in Arms Regulations (22 C.F.R. § 120 et seq) and Treasury Forfeiture Fund (31 U.S.C. § 9705). Travelers must be mindful of items they are traveling with and consult with the University’s Export Control Officer to determine if traveling with such items requires approval, authorization, or license prior to travel.
3. The University’s Export Control Officer will be consulted when International Travel to Elevated-risk Destinations is contemplated.

G. High Cybersecurity Risk Countries

The University operates an Information Security Program to promote protection of the confidentiality, integrity and availability of University data. The University will compile a list of High Cybersecurity Risk Countries from various government sources, including the U.S. Department of State’s, the Office of Foreign Assets Control (OFAC), the Federal Bureau of Investigation (FBI), and the Office of the Director of National Intelligence (ODNI). Travelers to a High Cybersecurity Risk Country must confer with the Office of Information Technology (IT) regarding action that must be taken to safeguard the University’s information security while engaged in International Travel. Anyone on DU Travel must comply with IT policies and procedures on [Mobile Devices and High-Risk Travel](#) available on the IT [website](#) for requirements and guidance about the transport and use of electronic devices when traveling to high cybersecurity risk destinations and the University program for loaner devices while traveling on University business.

H. Human Subjects Research

International Travel for the purpose of conducting Human Subjects Research requires must be approved by the University’s Institutional Review Board. Travelers must be knowledgeable of the University’s Human Subjects Research Protection policies and procedures and comply with them fully during their International Travel.

I. Travel by Federally Funded Researchers

1. The University is required to maintain strict oversight of the International Travel conducted by Federally Funded Researchers. Pursuant to the National Security Presidential Memorandum,

NSPM-33, the University will screen all International Travel conducted by Federally Funded Researchers to maintain compliance with federal law and regulation.

2. All International Travel conducted by a Federally Funded Researcher including both DU Travel and Non-DU Travel must be approved by the Office of Research and Sponsored Programs (ORSP).
3. The University will maintain a record of all International Travel conducted by Federally Funded Researchers:
 - a. All Federally Funded Researchers will complete the Travel Registration process consistent with this Policy creating an institutional record of such International Travel.
 - b. International Travel by Sponsored Program Researchers to Elevated Risk Destinations requires approval by the ITC.
 - c. ORSP will produce reports from Pioneer Travel and Expense documenting Federally Funded Research.
4. Any Federally Funded Researcher that received funding from a Public Health Service (PHS) agency or any other entity that has adopted PHS regulations must submit a conflict of interest in research disclosure form pursuant to the ORSP Conflict of Interest in Research policy.
5. Prior to departure Federally Funded Researcher's will receive the following information:
 - a. Mandatory security briefings, designed to provide the Federally Funded Researcher with information regarding how to maintain the security of their research while traveling.
 - b. Advice regarding electronic device security and access to the IT loaner program if traveling to a High Cybersecurity Risk Country.

IV. DEFINITIONS

- A. **“[CDC Travel Health Notice](#)”** means a notice issued by the Centers for Disease Control and Prevention to inform travelers and clinicians about current health issues that impact traveler's health, like disease outbreaks, special events or gatherings, and natural disasters in destinations around the world.
- B. **“[Department of State Travel Advisory](#)”** means assessments issued by the U.S. Department of State to advise, describe the risks and provide guidance to travelers to promote their safety while traveling abroad. Travel Advisories are issued in four standard levels: Level 1- Exercise normal Precautions,

Level 2- Exercise Increased Caution, Level 3 -Reconsider Travel, and Level 4 -Do Not Travel.

- C. **“Destination”** means the region to which the traveler intends to travel. This may be an entire country, or an area defined within a country.
- D. **“Federally Funded Researcher”** means University employees or students who are engaged in any manner in research that is funded in part or in whole by an agency of the United States government.
- E. **“[DU Passport](#)”** means the online Application and Travel Registration system for the DU community.
- F. **“DU Travel”** for purposes of this Policy means International Travel that falls into one or more of these categories:
 - 1. Funded entirely or in part by University resources;
 - 2. Organized primarily by the University (e.g., the University selects the participants);
 - 3. Conducted for University business and/or in academic-related programs;
 - 4. Related to scholarly activities, whether paid by the University or not;
 - 5. Requires the use of University equipment, supplies, or personnel.
- G. **“[Elevated-Risk Destination](#)”** means a destination that the University deems to be of "High" or "Extreme" after considering, among other security and health factors, (1) advice from the University’s travel assistance company; (2) the U.S. Department of State Travel Advisories; and (3) the CDC’s Travel Health Notices.
- H. **“Experiential Travelers”** means individual undergraduate or graduate students engaging in activities including but not limited to, research abroad, independent University-affiliated travel (e.g., conferences), self-identified (i.e. not affiliated with the University) and approved study abroad programs.
- I. **“[High Cybersecurity Risk Countries](#)”** means countries that the University’s Office of Information Security identifies as posing varying levels of risk to the confidentiality of University data based on information from a number of sources, including the U.S. Department of State’s Travel Warnings, the Department of the Treasury Office of Foreign Assets Control (OFAC), the Federal Bureau of Investigation (FBI), and the Office of the Director of National Intelligence (ODNI).
- J. **“Human Subjects Research”** means the systematic scientific evaluation of a living human for the purpose of engaging in clinical or non-clinical research and evaluation.

- K. **“International Travel”** means travel outside the United States, its possessions, and territories.
- L. **“International Travel Health and Safety Team”** is a functional team within the Office of Enterprise Risk Management that administers international travel preparation, support, risk review, and incident response coordination.
- M. **“Institutional Review Board”** is a board that reviews research involving human subjects through either direct interaction, collection of biospecimens, or identifying information to facilitate compliance with ethical and regulatory requirements, to maintain the University's status as a top-tier research institution, and to protect the privacy rights of human research participants.
- N. **“Office of Enterprise Risk Management (ERM)”** works closely with the University community to manage the risks of the University and to provide transparent information on insurance and workers' compensation, international travel and compliance, privacy, public health, and records management.
- O. **“Office of Foreign Assets Control”** is an office within the U.S. Department of the Treasury that administers and enforces economic and trade sanctions based on U.S. foreign policy and national security goals against targeted foreign countries and regimes, terrorists, international narcotics traffickers, and other groups.
- P. **“Office of Internationalization”** is an office led by the Vice Provost for Internationalization that facilitates cross-campus opportunities for global engagement and international experiences; focuses on supporting global research, curriculum, and educational opportunities that help students, faculty and staff develop and champion diverse cultural perspectives; and provides opportunities for the internationalization of professional development and engaging with international partners.
- Q. **“Office of International Education”** is an office that supports much of the University-approved undergraduate study abroad programming and the student experience in these programs by developing policies, procedures, and best practices for the study abroad experience.
- R. **“Office of Research and Sponsored Programs”** is an office that serves the needs of the University research community by providing assistance with funding and proposals, project administration and financial reporting; working with faculty, students, and scholars on intellectual property issues; facilitating compliance with ethical principles and professional standards for conducting research; reviewing research agreements; and facilitating compliance with applicable export control laws and regulations.

- S. "Program Leader"** is any person with a University of Denver affiliation and qualification appointed to accompany education abroad programming participants outside of the United States. The Program leader's responsibilities include, but are not limited to, completing the Program Leader training, preparing program participants for their time abroad with attention to destination information, ensuring all participants have registered their travel in the appropriate University system, management or co-management of the on-the-ground logistics while abroad, assessment of the participant's program requirements, swift and reasonable care for participants facing medical, mental health, security, equity, or legal challenges, cooperating with the appropriate University offices on resolution of conduct impacting the abroad experience, reporting of any and all incidents abroad that affect the health, safety, security of program participants, and notifying and cooperating with the appropriate University representatives regarding any foreseeable alterations to itinerary, costs, or participant list.
- T. "Travel Registration"** means supplying the details of one's travel (e.g., dates, destination, purpose) in the appropriate system helps assist the University in locating, making contact, and providing resources in case of an emergency or developing situation that could impact a traveler.
- U. "Unit"** means a college, department, school, program, research center, institute, business center, transaction center, office, or other operating unit.
- V. "[Undergraduate Academic Programs](#)"** are rigorous and rewarding experiences for University students through a holistic approach to education. Through learning, scholarship and practice, students gain the experience, knowledge, and courage they need to tackle big challenges in the real world and guide diverse communities and organizations.
- W. "University Funds"** means all funds controlled by or administered by the University of Denver, including, but not limited to, base operating budget funds, endowment funds, gift funds, grant funds, and investment funds.

Revision Effective Date	Purpose
2/3/2023	<i>Major revisions to create a comprehensive International Travel Policy, sunset University Policy INTL 2.50.071 – COVID International Travel Policy, and to change the Responsible Department to the Office of Enterprise Risk Management</i>
9/26/2023	<i>Minor revisions to align policy with practice</i>
4/3/2024	<i>Major revisions to address National Security Memorandum, NSPM 33.</i>

Appendix I

Traveler	Register International DU Travel	When to seek International Travel Committee (ITC) approval for DU Travel to elevated risk destinations	Restrictions
Employees	Yes	Not required	None
Employees traveling with students	Yes	During the program proposal process	No undergraduate travel to "Extreme" risk locations.
Undergraduates	Yes	Destination is labeled "High" risk	No undergraduate travel to "Extreme" risk locations.
Graduates	Yes	Destination is labeled "Extreme" risk	None, unless in "Extreme" risk destination.
Those on personal travel	No		None