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
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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

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.

- **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):
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C. Taking Students Abroad

- 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.

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

- **K.** "International Travel" means travel outside the United States, its possessions, and territories.
- L. "International Travel Health and Safety <u>Team</u>" 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.

Appendix I