

Case Western Reserve University Policy

Title: International Travel Risk Management Policy

Approved by: Barbara R. Snyder, President

Date Approved: September 10, 2020

Effective Date: January 1, 2021

Responsible Official: Vice Provost for International Affairs

Responsible University Offices: Center for International Affairs and the Office of General Counsel

Review Period: 5 years

Relates to: All CWRU community members (faculty, staff, students, post docs, etc.) traveling internationally on behalf of CWRU or using CWRU resources

I. Summary of the Policy

Case Western Reserve University (CWRU) community members, including but not limited to faculty, staff, students, post docs, emeriti faculty, and alumni, frequently travel internationally on behalf of CWRU. This policy outlines the appropriate risk management precautions and responses the international travelers on behalf of CWRU should take in order to minimize travel risk. While all CWRU community members are required to register in advance of their CWRU related international travel, the policy provides additional unique requirements for undergraduate students, graduate students, employees, and employees traveling with students. In times of crisis, additional requirements in regards to international travel may be implemented.

II. Purpose

The purpose of this policy is to ensure an understanding about the standardized risk management and required registration procedures concerning international travel at CWRU. Specifically, the purpose of this policy is to:

- a. Outline the registration procedures prior to international travel,
- b. Explain the benefits provided to CWRU constituents upon registration, and
- c. Create clear guidelines to protect all CWRU community members when traveling abroad.

III. Definitions

CWRU International Travelers—an umbrella term referring to any CWRU student, employee, or affiliate who is traveling abroad on behalf of CWRU, with CWRU, or using CWRU resources.

CWRU Students—degree seeking or non-degree seeking persons enrolled in a credit or non-credit program at CWRU.

Undergraduate Students—degree seeking or non-degree seeking persons enrolled in a credit or non-credit undergraduate program at CWRU

Graduate/Professional Students—degree seeking or non-degree seeking persons enrolled in a credit or non-credit graduate or professional program at CWRU

Employees—faculty, staff, post docs, visiting scholars, or emeriti faculty

CWRU Affiliates—Alumni or community members who are traveling internationally on a CWRU program

Education Abroad—any instance where a CWRU student (see definition above) is traveling abroad using CWRU resources, receiving CWRU credit or transfer credit, traveling on behalf of CWRU, or traveling with the endorsement of the university. Examples include:

- Faculty-led and faculty-designed group programs for academic credit
- Faculty-led and faculty-designed study tours not for credit
- Overseas travel by student organizations not for credit
- Any other instance where students go abroad for endorsed CWRU academic purposes, credit and/or not for credit, for example:
 - Internships
 - Co-ops
 - Exchange programs
 - Provider programs
 - Direct enrollment at institutions abroad
 - Research
 - Service programs
 - Conference travel with CWRU funds or representing CWRU

Long-Term and Summer Programs—traditional study abroad programs for a semester, academic year, or summer where students are studying at a partner institution or field school.

Faculty-Led Programs—Any credit or non-credit program where faculty and/or staff, in their role as a CWRU employee, are taking a group of CWRU students to another country.

Faculty-Designed Programs—Any credit or non-credit program organized by faculty and/or staff, in their role as a CWRU employee, where students are traveling to another country without an accompanying faculty or staff member.

Individualized Academic Travel (IAT)—CWRU students traveling abroad on independently designed programs for academic purposes (research, field work, CWRU internships, Co-op, etc.) using CWRU funding, gaining CWRU credit, utilizing CWRU connections, or on behalf of CWRU.

Approved Programs—semester, academic year, or summer programs that have been vetted by the Office of Education Abroad (OEA). These programs are approved by the Education Abroad Advisory Council.

IV. Resources/Regulations for all CWRU International Travelers

a. *International Travel Registration*

CWRU administers an international travel registration process where CWRU international travelers are required to register their travel with the Center for International Affairs in order to receive several benefits, such as:

- i. Security in knowing that CWRU is prepared to assist the traveler in the event of an emergency during travel.
- ii. Information about and registration for CWRU's medical emergency insurance policy that covers every CWRU international traveler while they are abroad on university business.
- iii. Export control regulation support to protect international travelers and their research/data while traveling.
- iv. Connections, if desired, to CWRU employees who may be experts in the area or who may have significant collaborations with universities or industry in the country of travel.
- v. Connections, if desired, to CWRU alumni in the country of travel.
- vi. Possible funding to support international travel in the form of site visit grants to study abroad locations. Travel must be registered at least one month in advance and be in a location where students study abroad to be considered for this opportunity.

b. *Emergency International Travel Insurance*

CWRU provides all CWRU international travelers emergency international travel insurance. This insurance does not apply during personal travel. More information about the emergency international travel insurance can be found through the CWRU Office of Risk Management.

c. *Department of State Travel Alerts, Center for Disease Control Warnings, and STEP Registration*

All CWRU international travelers are encouraged to check the Department of State travel alerts and the Center for Disease Control warnings before and during travel. These alerts can be found at the Department of State and CDC websites, respectively. Both sites provide valuable information on the country and region in which employees may be traveling. Additionally, all travelers are encouraged to register their travel in the Department of State Smart Traveler Enrollment

Program (STEP), which provides up-to-date information regarding changes in the area.

d. ***Export Control Regulations***

CWRU supports the dissemination of knowledge and technology in ways that are consistent with U.S. national security objectives. All CWRU travelers must adhere to export control regulations. Federal export control laws, which restrict transmissions of certain information, materials, equipment, and technologies, including oral communications regarding those technologies, to foreign nationals, affect a broad range of university activities such as research, international shipping, purchasing products from foreign vendors, and international travel. Contact the CWRU Compliance Office for more information.

V. **CWRU Student Travel**

The Office of Education Abroad (OEA) as a part of the Center for International Affairs is responsible for maintaining the risk management standards of students, administrators, and faculty participating in education abroad experiences.

a. ***Faculty-Led and Faculty Designed Programs***

- i. All CWRU students going on a faculty-led or faculty-designed study abroad program must apply through the OEA to ensure that safety precautions are followed. Students will not be permitted to participate in a CWRU program abroad unless they have filed the appropriate application.
- ii. All CWRU students going on a faculty-led or faculty-designed study abroad programs must attend a health and safety pre-departure orientation. Students will not be permitted to participate in a CWRU program abroad unless they attended this pre-departure orientation.

b. ***Long Term and Summer Programs for Undergraduates***

- i. All CWRU undergraduate students participating in a long term or summer program can only take part in an approved program that is currently active. Programs may be deactivated when agreements expire, when the location of the partner institution is no longer determined safe for CWRU students, or when the program no longer meets the needs of CWRU students. Students wishing to participate in a non-approved program must petition to the OEA, where the program will be reviewed to determine: 1) if there is a strong academic reason why this program is more suitable for the student than programs on the approved list, and 2) if the program/location is safe for undergraduate students.
- ii. All undergraduate students participating in a long term or summer program must apply through the OEA in accordance to OEA deadlines in order to ensure that risk management procedures are followed. Students will not be recognized as a CWRU student during the semester abroad nor be allowed to transfer credit to CWRU unless they have filed the

appropriate application and risk management paperwork in the OEA and attended the pre-departure orientation on health and safety.

- iii. All undergraduate students participating in a long term or summer program are required to attend a pre-departure orientation on health and safety.
- iv. All undergraduate students participating in a long term (academic or semester program) are required to attend a cultural pre-departure orientation in addition to the pre-departure orientation on health and safety.

c. ***Long Term/Summer Programs for Graduate/Professional Students***

- i. All graduate students participating in an established long term or summer program can only take part in a program approved by their department, school, and/or advisor.
- ii. All graduate students participating in a long term or summer programs must apply through the OEA in order to ensure that risk management procedures are followed. Students will not be recognized as a CWRU student during the semester abroad nor to transfer credit to CWRU unless they have filed the appropriate application and risk management paperwork in the OEA.
- iii. All graduate students participating in long term or summer programs must complete a pre-departure orientation on health and safety.

d. ***Individualized Academic Travel***

- i. All CWRU students participating in individualized academic travel must register through the OEA in accordance to OEA deadlines in order to ensure that risk management procedures are followed.
- ii. All CWRU students participating in individualized academic travel must complete a pre-departure orientation on health and safety.
- iii. Students who do not complete this registration and orientation by the OEA deadline will not be permitted to travel abroad using CWRU resources or receiving CWRU credit.

- e. ***Travel Restrictions***—The Department of State and the Center for Disease Control post travel advisories to inform travelers of particular risks associated with traveling abroad. CWRU students are not permitted to travel to countries or areas within countries that have a level 4 advisory on the US Department of State travel advisory list. CWRU students are permitted to travel to countries or areas with a level 1 or 2 advisory on the US Department of State travel advisory list. CWRU students are not permitted to travel to countries, or areas within countries, that

have a level 3 travel advisory from the US Department of State unless they successfully petition to do so.

CWRU students can travel to countries with a level 1 or 2 advisory from the Center for Disease Control. CWRU students cannot travel to countries with a level 3 advisory from the Center for Disease Control, regardless of the Department of State travel warning, though usually a level 3 from the CDC also results in a higher advisory from the Department of State as well.

- f. ***Petitions***—CWRU students can petition to travel abroad if a country or region has a level 3 state department warning. Each petition will be reviewed on a case-by-case basis as each situation is unique.

The OEA has the authority to review and respond to petitions. In the event that the OEA is unsure or concerned about a particular country or location within that country, the OEA will refer the program to the International Travel Risk Management Committee (ITRMC) for final evaluation.

CWRU students may not petition to travel to countries or regions with a level 4 state department advisory or a level 3 CDC warning.

- g. ***Travel Advisory Changes***—Should a travel advisory escalate to a Department of State level 3 any time before the start of a program, the OEA will review the situation. Should a travel advisory escalate to a Department of State level 4 or a CDC level 3 any time before the start of a program, the program will be cancelled. Should a travel advisory escalate to a Department of State level 3 or 4 or should the CDC level rise after a program is in progress, the situation will be reviewed. In the event of an emergency situation, the OEA will consult with the appropriate officials and take action appropriately.
- h. ***International Travel Risk Management Committee***—The International Travel Risk Management Committee (ITRMC) will review cases and programs where safety and risk are a concern. The ITRMC will determine whether or not the location is safe for CWRU student travel. The ITRMC will be made up of university officials and faculty with expertise in international travel and risk management. When the ITRMC convenes, the committee will invite additional faculty and staff with specific expertise in the regions of the world under risk consideration. The ITRMC will advise the Provost on appropriate action, with the Provost making the final decision.

VI. Employee Travel

- a. ***International Travel Registration***
Employees are required to register their CWRU-related international travel with the Center for International Affairs, including international travel while on sabbatical for the purpose of research. As a part of this registration, CWRU may

collect a general itinerary, contact information while abroad, and passport information. Employees will also have access to electronic risk management resources through this registration. The registration is not for approval of travel or to provide travel arrangements, but rather to provide the university with travel information so that CWRU can provide pre-travel resources and respond in the event of an emergency during travel. Travel approval is granted on the supervisor/departmental/dean level following established departmental and university procedures.

b. ***Traveling with Non-CWRU Persons***

CWRU understands that employees may occasionally travel for business purposes with individuals who are not traveling on behalf of the CWRU community, i.e., family, friends, or other non-CWRU colleagues. Companions on international travel are not covered by the CWRU emergency international travel insurance policy, but are encouraged to purchase their own emergency international travel insurance while abroad.

VII. Employees Traveling with CWRU Students

Employees frequently travel abroad with students on study abroad programs, to conduct research, to attend conferences and meetings, to conduct field studies, etc. CWRU encourages employees to include students in their international engagements, but recognizes that taking a leadership role when traveling with students requires employees to adhere to a higher standard of awareness and care in regards to risk than when traveling alone or simply in conjunction with students.

Examples of employees traveling with students include, but are not limited to,

- study abroad programs,
- employees traveling with an undergraduate or graduate research, internship, or service learning student or students,
- any time employees are arranging transportation, hotel, or other logistics for the student(s), and take a leadership role in the travel or experience.

Employees traveling internationally with CWRU students are expected to:

- a. Attend a mandatory risk management training on traveling with students offered frequently by the Center for International Affairs. This training is valid for two years and then must be retaken.
- b. Register their travel (and have the students register their travel) with the Office of Education Abroad.
- c. Provide the Office of Education Abroad and the students with an in-country 24/7 emergency contact.
- d. Secure housing and in-country transportation (where appropriate) that is safe, reputable, and affordable. The Office of Education Abroad can assist in vetting housing and transportation options.
- e. Be available to the students throughout the entirety of the official travel.

- f. Avoid high risk activities as a part of the official travel.
- g. Adhere to all university policies while on official travel.
- h. Provide a program itinerary as directed by the Center for International Affairs.

Because all situations are unique, employees should contact the Center for International Affairs if they have questions. The Office of Education Abroad has created a faculty-led study abroad handbook that includes more information on securing housing and travel, on high risk activities, and on other best practices when traveling with students abroad. Employees are encouraged to refer to this handbook as a resource. Significant deviation from best practices will be evaluated as necessary.