

## Policy on Travel to High-Risk & Sanctioned Destinations

### GOVERNANCE AND LEGAL

Effective Date: February 4, 2021

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Supersedes: Policy on International Travel

Related Policies: Policy Requiring Registration of University Travel; Policy on Foreign Corrupt Practices Act; Policy on Computers and Mobile Devices for Travel to Destinations with Heightened Cybersecurity Risk; Policy on Mobile Devices; Policy on Travel & Expense Reimbursement; Policy on Export Control

Responsible Office/Department: Office of the Provost, Office of the Chancellor

Keywords: Travel Registry; High Risk Travel

### I. Purpose and Scope

Northeastern University is committed to the health, safety and security of all members of the university community. As a global institution, our community members undertake travel for many reasons such as teaching, research, academics, consulting, service, athletics, cocurricular activities, experiential learning and business purposes intended to advance the mission of the university. This policy establishes requirements, standards, and expectations associated with travel to high-risk destinations, as defined below, and outlines institutional support designed to reduce personal and institution risk and further Northeastern's global mission. This policy applies to all university travel, as defined in this policy, by staff, administrators, students, and faculty to high-risk and sanctioned destinations, regardless of funding source. This policy does not apply to personal travel.

### II. Definitions

For purposes of this policy,

**University Travel** means academic, business, extra- or co-curricular travel that is part of a university program or project, authorized by, at the request of, funded, coordinated, or administered by Northeastern University. Such travel may include but is not limited to teaching, study, research, consulting, conference attendance, co-op, service, administrative work, field studies, volunteer work, performances, athletic contests, and trips in connection with a university recognized student organization, academic or administrative unit, such as Advancement events, and Admissions outreach. University Travel does not include an individual's commute from their residence to their primary work site, travel within the region of their primary work site (including travel to or between campus locations during the work

day with no overnight stay or international border crossing), or personal side trips or personal business in which employees may engage in conjunction with university travel.

**University Travelers or Travelers** refers to Northeastern students, faculty and/or staff on University Travel.

**High-Risk Destinations** refers to countries, regions, provinces, and cities, including within the U.S., that pose health, safety and security concerns. Northeastern University uses the following authorities' risk ratings to determine which areas are considered high-risk:

- Current U.S. Department of State Travel Advisory level 3 ("Reconsider travel"), level 4 ("Do not travel"), or labeled with the caveat "Reconsider travel," or "Do not travel" within the narrative of the advisory,
- Centers for Disease Control and Prevention Travel Notice Warning Level 3,
- The university's global travel support provider's list of countries related as either HIGH (risk level 4) or EXTREME (risk level 5), and
- Those destinations subject to U.S. sanctions.

The university reserves the right in its sole discretion to designate other locations as "high-risk."

**Supervisors** refers to the appropriate person or office to authorize travel to high-risk destinations:

- For faculty, their Dean or the Dean's designee
- For staff members, their unit Vice President/Senior Vice Provost/Senior Vice Chancellor or their designee
- For students, and faculty leading student programs, the director of the office overseeing the university-sponsored program (e.g., GEO, co-op, etc.)

**Sanctioned Countries and Entities** are countries and entities subject to United States trade or economic restrictions. These lists are administered by the [U.S. Treasury Department's Office of Foreign Assets Control](#) (OFAC), U.S. Department of Commerce through its [Bureau of Industry and Security Lists of Parties of Concern](#), and The International Traffic in Arms Regulations (ITAR) found on the U.S. Department of State [Directorate of Defense Trade Controls website](#).

**Global Safety and Security Assessment Committee (GSSAC)** refers to the standing committee that has been charged by senior leadership to assess travel-related risks; review and recommend travel policies and protocols; develop and initiate a coordinated emergency response strategy for various risk event categories; monitor changing travel conditions; oversee travel-tracking requirements and reporting; review travel insurance and support services; evaluate and decide

on petitions for travel to “High Risk” destinations; and recommend travel safety training requirements.

### **III. Policy**

University travel to or through high-risk destinations is not permitted without proper authorization. The university recognizes that on rare occasions there might be compelling reasons to consider allowing a program in or travel to a high-risk or sanctioned location to proceed. To facilitate this consideration, any traveler or student group leader wishing to travel to or thorough a high-risk destination must seek and obtain authorization in accordance with this Policy. Student and faculty-led student travel require an approved petition through GSSAC. Faculty and staff travel require authorization by an immediate supervisor and a signed acknowledgement of risk. Travel to sanctioned countries and/or travel involving sanctioned entities requires additional review and approvals.

The university reserves the right to restrict, deny or postpone any university travel program or activity if the risk of travel may pose an undue risk to the health, safety or well-being of the traveler or others

All travelers proposing to undertake university travel to high-risk and/or sanctioned destinations must comply with the applicable provisions set forth below. Exception Petitions can be accessed through the [University Travel website](#).

#### **1. Authorization**

All university travel to high-risk destinations must be authorized by the applicable supervisor in advance of the travel. Students and faculty leading student programs must obtain authorization prior to submitting a petition to GSSAC for approval. Travelers using the petition process must show compelling reasons for the travel to that destination and at that particular time, traveler familiarity with the risks, and a plan for minimizing and mitigating the risks.

Many external funding agencies require that University Travel be approved in advance. University Travel in connection with externally sponsored research and other activities must follow the guidelines on the [NU Travel Checklist](#) posted by the office of Research Enterprise Services (NU-RES) In addition, there may be other restrictions when using external funds; for more information please contact your NU-RES representative and the [Policy on Travel & Expense Reimbursement](#).

## **2. Registration of University Travel**

As set forth in the [Policy Requiring Registration of University Travel](#), all university travel must be registered in the university's [travel registry](#) in advance of travel. Registration is especially critical for travel to high-risk destinations, where destination-specific pre-travel advice is even more essential, and there may be a higher likelihood that the university will need to locate/contact travelers in the event of a crisis or unexpected developments (such as an outbreak of disease, civil unrest, natural disasters or terrorism) that may affect travel, and in order to provide available assistance and support.

In addition, if a petition for travel to a high-risk international destination(s) is approved, travelers must enroll with the State Department at <https://step.state.gov/step/> or the equivalent citizen services from the traveler's country of citizenship. Travelers should also install and download the apps and software from the university's [global travel support provider](#) prior to departure.

Registration should be completed at least 48 hours in advance of travel. Travel booked through Egencia will automatically be added to the travel registry. Questions about registration may be directed to the contacts noted below.

## **3. Travel to U.S. Sanctioned Destinations**

All travelers wishing to travel to countries, or engage in business with entities, subject to the administration and enforcement of U.S. economic embargoes and trade sanctions must submit the proposed trip to GSSAC and provide the appropriate U.S. Government approval documentation. **No travel to U.S. sanctioned countries or business interaction with sanctioned entities may be conducted without U.S. Government and GSSAC approval.** A current list of sanctioned countries can be found at [OFAC's Resource Center](#). For all proposed travel to or involving a sanctioned country or if you would like assistance in determining whether transactions with specific institutions, entities or individuals are prohibited under U.S. sanctions regulations, please contact [exportcontrol@northeastern.edu](mailto:exportcontrol@northeastern.edu) as early as possible in your planning.

## **4. Export Controls**

When traveling outside of the U.S., travelers are "exporters" of any tangible items and technical information they take with them and/or share abroad. Depending on the items being transported and the countries being visited, an export license may be required prior to departure. Electronic devices, such as laptops, tablets and cellphones, as well as the data on such devices and the underlying technology and encryption software, are all subject to export

controls. In addition, the fundamental research exception is not applicable to physical exports from the U.S. to a foreign country. Therefore, taking equipment abroad that is related to University research covered by the fundamental research exception nonetheless may be subject to certain export controls (see also section 7, Connectivity). For additional information and guidance on export controls, please see the [Policy on Export Controls](#) and the [Export Control Compliance Manual](#). For assistance in determining whether export controls apply, please contact [exportcontrol@northeastern.edu](mailto:exportcontrol@northeastern.edu). See Section 7 below, and the “[University Travel Safety and Security Tips](#)” for guidance on traveling with electronic devices.

## **5. Insurance and Evacuation/Emergency Travel Assistance**

Information about health insurance and evacuation/emergency travel assistance can be found on the University Travel website [make this a link].

All travelers undertaking university travel must possess personal health insurance that provides medical coverage for the duration of travel in the destination(s) of travel (including stopovers and travel prior to program start and after program completion).

## **6. Evacuation/Recall of Travelers**

The university reserves the right to require that all university travelers evacuate a given location when, in its sole judgment and discretion, it determines that continued presence in that location may endanger the health, safety or well-being of university travelers or others.

University travelers who fail to heed a university instruction to interrupt or evacuate do so at their own risk, and are on notice that the university may not be able to respond with assistance. Such travelers may forfeit emergency travel insurance coverage, academic credit, tuition payments or expense reimbursement, and may be held responsible for additional expenses incurred by the university due to the individual’s refusal to follow policy. In addition, travelers may be subject to local administrative or law enforcement actions related to the specific local conditions and restrictions.

## **7. Connectivity**

All university travelers must meet the university’s [connectivity requirements](#). All travelers must adhere to the university policies regarding use of telecommunication and personal mobile devices. If applicable, travelers must review their destination’s laws specific to satellite phone use and consult with the NUPD International Safety Office prior to traveling.

When traveling to locations presenting a heightened cybersecurity risk, as listed on the University Travel webpage, faculty and staff travelers may not take university-issued electronic devices, and should avail themselves of the loaner device program administered by the Help Desk under the [Policy on Computers and Mobile Devices for Travel to Destinations with Heightened Cybersecurity Risk](#).

#### **8. Personal Travel Outside of the Program Itinerary (“Side Trips”)**

Students are required to register any side trips in the [university’s travel registry](#). Faculty and staff are encouraged to register any personal side trips.

Travelers must rely on their personal health and other insurances (such as evacuation and repatriation insurance) while on personal side trips, but may avail themselves of the university’s response program for country information, alerts, and to identify support resources. For more info about insurance email [insurance@northeastern.edu](mailto:insurance@northeastern.edu).

NU discourages side trips to high-risk or sanctioned areas as defined above.

Travelers need to submit an Assumption of Risk, Release and Liability Waiver for Travel/Activity Outside Faculty Led International Program form when applicable.

#### **IV. Additional Information**

Information regarding high-risk destinations can be found on the [University Travel](#) website. Trip-specific Assumption of Risk and General Release from Liability Forms may be found on the [Global Experience Office](#) and [University Travel](#) websites.

No traveler shall be required to travel to a location designated as high-risk as defined in this Policy.

Students failing to comply with the requirements of this Policy may be prevented from traveling, may not receive credit for the course/program, and/or may be excluded from participating in other Northeastern global programs.

Staff and faculty may also register personal travel in order to have access to travel alerts from our logistics provider and notifications from the university in the event of unforeseen events or emergencies.

#### **V. Contact Information**

Office of International Safety, [mytravelplans@northeastern.edu](mailto:mytravelplans@northeastern.edu) or 617-373-7490.