

## GOVERNANCE AND LEGAL

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Related Policies:

Policy on Travel &  
Expense  
Reimbursement; Rights  
and Responsibilities  
Under Title IX; Policy on  
Appropriate Use of  
Computer and Network  
Resources; Policy on  
Export Control; Policy  
on Mobile Devices;  
Policy on Foreign  
Corrupt Practices Act

Responsible  
Office/Department:  
Office of the General  
Counsel; Office of the  
Provost; and Senior  
Vice President for  
Enrollment  
Management/Student  
Affairs and CEO Global  
Network

Keywords: International  
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High Risk Travel;  
Exception Petition

# Policy On International 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 international travel in pursuit of teaching, research, consulting, service, co-curricular activities, and work intended to advance learning, consistent with the mission of the university. This policy establishes standards and expectations associated with international travel, and outlines institutional support designed to reduce personal and institutional risk. This policy applies to international travel by all staff, administrators, and students that is sponsored or coordinated by, funded in any part or manner by, or involves the granting of degree credits by Northeastern University. This policy does not apply to personal travel by students, staff and administrators.

## II. Definitions

For purposes of this policy,

**University-Sponsored Travel** means academic or business travel taken by Northeastern staff, administrators, and students authorized, funded, coordinated or administered by Northeastern University. Such travel may include but is not limited to teaching, research, consulting, coop, service, administrative work, field studies, volunteer work, performances, athletic contests, and trips abroad in connection with a university recognized student organization, academic or administrative unit.

**International Travel** means travel undertaken outside of the 50 United States, U.S. Territories or Possessions.

**High-Risk Destinations** refers to countries, regions and cities under current U.S. Department of State Travel Warnings. The term also includes locations that pose health, safety and security concerns as indicated on the university's [global travel support provider's](#) list of countries related as either HIGH (risk level 4) or SEVERE (risk level 5), or areas garnering a Centers for Disease Control and Prevention Travel Notice Warning Level 3. The university reserves the right in its sole discretion to designate other locations as "high-risk."

**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), US Department of Commerce [Bureau of Industry and Security Lists of Parties of Concern](#), and The International Traffic in Arms Regulations (ITAR) found on the US Department of State [Directorate of Defense Trade Controls website](#).

**International Safety and Security Assessment Committee (ISSAC)** refers to the university's standing committee that is responsible for: assessing international travel-related risk; reviewing and recommending travel policies and protocols; developing and initiating a coordinated emergency response strategy for various risk event categories; monitoring changing travel conditions; advising and making recommendations to the appropriate Senior Vice President; overseeing travel-tracking requirements and reporting; reviewing travel insurance and support services; evaluating petitions for travel to "High Risk" destinations; and recommending travel safety training requirements. ISSAC is co-chaired by the Senior Vice Provost for Undergraduate and Experiential Learning and the International Security Specialist. Its members are appointed by Senior Vice Presidents and include members from relevant divisions of the university and Northeastern University Police Department (NUPD). ISSAC may seek expertise beyond the committee to inform its work.

### **III. Policy**

It is the policy of Northeastern University to sponsor and support many activities of teaching, study, research, and service in a global context. To that end, Northeastern continues to expand its global footprint, international engagement and travel activities. All travel entails some degree of risk, with travel to some locations involving relatively higher levels of risk.

The university sets forth a number of standards and expectations in support of its educational mission and the health and safety of all community members. This policy applies to all international travel by all staff, administrators, and students that is

sponsored by, funded or coordinated in any part or manner by, or involves the granting of degree credits by Northeastern University.

### 1. Authorization

All university-sponsored international travel must be authorized by immediate supervisor in advance of the travel. The university reserves the right to restrict, deny or postpone any university-sponsored international travel program or activity if, in the determination of the Provost or Senior Vice President, the risk of travel may endanger the health, safety or well-being of participants.

Many external sponsors require that each trip abroad be approved in advance. The traveler must complete and submit a Notification of Foreign Travel to Research Administration and Finance in advance of their trip. The university policy and procedures on foreign travel in connection with sponsored research must follow the guidelines stated on the Office of Research Administration and Finance's (ORAF) website at [northeastern.edu/research/raf/policies-guidelines/](http://northeastern.edu/research/raf/policies-guidelines/). In addition, there may be other restrictions when using sponsored funds and for more information please contact your ORAF representative and the Policy on Travel & Expense Reimbursement [northeastern.edu/travel/wp-content/uploads/2013/12/TEPolicy.pdf](http://northeastern.edu/travel/wp-content/uploads/2013/12/TEPolicy.pdf).

### 2. Registration of University-Sponsored International Travel

The university maintains a Travel Registry offering available assistance and support to community members regardless of location and or time of day.

All **students are required** to enter their travel plans along with all other requested information in the Travel Registry in advance of any planned travel. Students failing to do so 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.

All **staff and administrators are required** to enter their travel plans along with all other requested information in the Travel Registry in advance of any planned university-sponsored travel. Registered travelers will be eligible for insurance coverage, emergency assistance and other services. Failure to register may impact access to and eligibility for such services, as well as travel expense reimbursement.

### 3. Travel to U.S. Sanctioned Territories

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 ISSAC 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 ISSAC approval.** A current list of sanctioned countries can be found at [OFAC's Resource Center](#) .

#### 4. Restrictions on Travel to High-Risk Destinations

Students, staff and administrators may not travel to “high-risk” destinations on university-sponsored travel without approval for an exception as described in the Petition for Exceptions section of this policy.

Information regarding “high-risk” destinations can be found on the websites of the university’s Global Experience Office (GEO) [northeastern.edu/geo/](http://northeastern.edu/geo/) and International Travel [northeastern.edu/international-travel](http://northeastern.edu/international-travel).

All travelers proceeding to “high-risk” destinations **must:** a) register with the university Travel Registry, b) enroll with the State Department at <https://step.state.gov/step/> or the equivalent citizen services from the traveler’s country of citizenship and c) register, install, and download the apps and software from the university’s [global travel support provider](#) prior to departure.

No person in any category of traveler shall be required to travel to a location designated as a “high-risk” location as defined in this Policy.

All student travelers are expected to know, understand, and assume full responsibility for the risks associated with planned travel and are required to sign a waiver prior to departure.

#### 5. Exceptions to Travel Restrictions to High-Risk Destinations

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 territory location to proceed. To facilitate this consideration, any staff, administrator, or student may petition for an exception.

Information about the Exception Petition process is maintained on the website of the Global Experience Office (GEO) [northeastern.edu/geo/](http://northeastern.edu/geo/), as well as the International

Travel [northeastern.edu/international-travel](http://northeastern.edu/international-travel) website. Undergraduate student travelers to “high-risk” or sanctioned territories require the signature of a parent/guardian as part of the submission for the Exception Petition process.

Staff and administrators who are traveling to a high risk destination, without students, will seek authorization from their immediate supervisor and Senior Vice President, or designee, following consultation with the International Security Specialist in NUPD.

ISSAC is the authorized body to review all Exception Petitions and to make recommendations to the Provost or other appropriate Senior Vice President regarding Petition requests.

Decisions by the Provost or Senior Vice President are final and are not subject to appeal.

#### **6. Assumption of Risk and General Release From Liability**

All student travelers are required to submit the appropriate Assumption of Risk and General Release from Liability Form. These forms are trip specific and may be found on the GEO [northeastern.edu/geo/](http://northeastern.edu/geo/) and International Travel [northeastern.edu/international-travel](http://northeastern.edu/international-travel) websites.

Students failing to do so 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.

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

Information about health insurance and evacuation/emergency travel assistance can be found on the Global Experience Office [northeastern.edu/geo/](http://northeastern.edu/geo/) and International Travel [northeastern.edu/international-travel](http://northeastern.edu/international-travel) websites.

All students undertaking University-sponsored International Travel must possess personal health insurance that meets minimum standards as prescribed by the university.

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

The university reserves the right to issue an instruction that all university staff, administrators, or students evacuate a given location when, in its sole judgment and

discretion, it determines that conditions in that location have changed and that continued presence, in that location, may endanger the health, safety or well-being of participants.

Evaluation and recommendations to the Provost or appropriate Senior Vice President regarding trip interruption and/or evacuation/recall will be made by ISSAC.

Staff, administrators, or students who fail to heed a university instruction to interrupt or evacuate do so at their own risk, may forfeit emergency travel insurance coverage, academic credit, tuition payments or expense reimbursement, and may be held responsible for additional expense incurred by the university due to the individual's refusal to follow policy. Students may be subject to disciplinary action.

#### 9. **Export Controls**

Various import and export control laws may prohibit or restrict mobile devices (e.g., laptops, tablets, mobile phones) or any device that contains restricted encrypted software overseas. Travelers proposing to take university devices or devices with access to the university's systems overseas must comply with applicable laws and the university's Export Control Policy and make appropriate notifications as outlined in the Export Control Policy. [northeastern.edu/research/raf/research-resources/export-control/](http://northeastern.edu/research/raf/research-resources/export-control/)

#### 10. **Phones**

Group leaders traveling with students as well as all travelers to "high-risk" locations and sanctioned territories must have reliable mobile or satellite phones or other communication devices approved by ISSAC that operate in the planned country(ies) visited. All travelers must adhere to the university policies regarding use of telecommunication and personal mobile devices. Travelers must review their destination's laws specific to satellite phone use and consult with the NUPD International Security Specialist prior to traveling.

### **IV. Additional Information**

Nothing in this Policy limits the authority of the university to issue, amend, or withdraw a Policy. All university policies and procedures apply while travelers are abroad and may be found on the university Policies website [northeastern.edu/policies/](http://northeastern.edu/policies/).

## **V. Contact Information**

Office of the Provost and Senior Vice President for Academic Affairs (617) 373-4517

Office of Risk Service (617) 373-5396

Global Experiences Office (617) 373-6465

NUPD Non-emergency Line (617) 373-2121