



Campus Administrative Policy

Policy Title: International Travel Policy for Official University Business

Policy Number: 1035 Functional Area: Academic and Faculty Affairs

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| | International Travel Policy for Faculty and Staff (Jan 1, 2013) |

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Responsible Officer: Provost and Executive Vice Chancellor for Academic and Student Affairs, CU Denver
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Applies to: CU Anschutz
CU Denver

A. Introduction

This policy provides guidance for official university business travel

under the auspices of the University of Colorado Denver | Anschutz Medical Campus, non-employee travel sponsored by the university, and travel by employees that is sponsored by another organization. It also outlines the obligations of individuals who are overseeing student international travel. This policy provides guidance to mitigate and manage risk inherent in international travel. Such travel includes all international travel related to the traveler’s professional responsibilities at the university, including travel pertaining to research, teaching, invited presentation, professional development, and all travel that includes supervision of students, residents, fellows or other trainees. (Note: Grant-funded international travel, where the grant is processed through the University of Colorado or the CU Foundation, is subject to this policy as well as to any regulations set by the granting agency.)

B. Table of Contents

| | |
|---|---|
| A. Introduction..... | 1 |
| B. Table of Contents..... | 2 |
| C. Policy Statement..... | 2 |
| 1. Travel Authorization, Registration and Insurance | 3 |
| 2. International Travel for Unaffiliated Travelers | 4 |
| 3. Travel to High-Risk Countries and Regions | 5 |
| 4. Employees and Students Abroad | 5 |
| 5. Promoting/Advertising International Learning and Experiential Opportunities..... | 6 |
| 6. Legal/Regulatory, Research, and Policy Compliance for International Travelers..... | 6 |

C. Policy Statement

Travelers are responsible for compliance with official University System and CU Denver | CU Anschutz international travel policies and with relevant U.S. and foreign laws and regulations. This policy covers travel under the auspices of the university; it does not pertain to international

travel that has no connection to the university, such as personal vacations.

1. Travel Authorization, Registration and Insurance

a. Required Travel Authorization and Compliance

University of Colorado System Administrative Policy Statement (APS) 4024, *Travel Authorization*, requires authorization for official university business travel in advance of the trip. Travelers must also comply with the Procurement Service Center (PSC) policies and processes regarding travel.

b. Required registrations

(1) Registration with the university's international assistance provider, currently International SOS.

All travelers traveling internationally under the auspices of the university are required to register with our international assistance provider. When travel arrangements are made through the University's preferred travel agent, currently Christopherson Business Travel, the itinerary is automatically uploaded into the international assistance provider's travel database. If the travel arrangements are made through any other source, travelers must forward their itinerary to CUTravel@itinerary.internationalsos.com or must manually add their travel itinerary into [International SOS](#) (membership number 11BCAS000006) through "My Trips" prior to undertaking international travel. Registration with International SOS provides information that will enable the University to confirm coverage for employee international medical and evacuation insurance as well as activate intervention services on the traveler's behalf in the event of an emergency.

(2) Registration with the U.S. Department of State

Prior to travel, university travelers who are U.S. citizens or

permanent residents should enroll their travel through the U.S. Department of State's web-based registration service, Smart Traveler Enrollment Program (STEP). Non-U.S. citizens should check with their respective governments for appropriate protocols.

c. Insurance for International Travelers (Employees)

The University of Colorado provides international medical and evacuation insurance to employees traveling internationally on authorized University business. Information regarding resources is available on the University Risk Management [International Travel](#) webpage and the [Procurement Service Center Travel](#) webpage. It is the responsibility of the traveler and the unit to understand the coverage provided and to determine whether any additional insurance is needed. For non-employees, the University strongly recommends purchasing international medical and evacuation insurance for the trip. Personal health insurance plans may not cover foreign medical treatment, co-payments, co-insurance, certain evacuation needs or out-of-network charges.

2. International Travel for Unaffiliated Travelers

a. Unaffiliated travelers accompanying university travelers

The University is not responsible for providing support or services to unaffiliated travelers. Prior to travel, the sponsoring unit should outline the associated risks of the activity on the [Travel Agreement, Notice of Risk and Waiver of Responsibility](#) and receive signatures indicating agreement from any and all accompanying unaffiliated travelers (family members, friends, unaffiliated colleagues). The template for the Travel Agreement, Notice of Risk and Waiver of Responsibility may be found on the [University Risk Management website](#). The employee's international travel approver (e.g., supervisor or department head) should maintain these waiver forms for a period of five years. There

may be prohibitions on unaffiliated travelers in certain instances.

Dependents/Family Members of university employees approved for accompanying travel, should independently purchase coverage from the [university's insurance plan](#).

- b. Volunteers and independent contractors traveling internationally on university business

Volunteers or independent contractors on temporary assignment pertaining to university business must comply with all university international travel policies for the duration of their travel and must sign the Volunteer Agreement and Waiver found on the [University Risk Management website](#) and send it to the university employee in charge of their travel. These travelers must also secure international travel accident and evacuation insurance on their own as they are not covered by the University's plan for employees.

3. Travel to High-Risk Countries and Regions

Travelers wishing to travel abroad under the auspices of the university to countries designated by the University of Colorado as high risk will be prevented from completing the international travel arrangements through the university's designated travel agency until further vetting is completed by a sub-set of the International Risk Management Committee (IRMC) or Export Controls, and approved by university senior leadership. High-risk countries or regions are those that pose a significant risk to health or safety, or pose export controls concerns. Once IRMC and/or Export Controls has vetted the travel, they will make a recommendation for travel approval/denial to the Chancellor or designee who will have the final decision regarding the international travel.

4. ACCOMPANYING or supervising Students Abroad

All individuals who will be accompanied by university students on international travel or who mentor, supervise or advise student(s) on international travel must inform the Office of Global Education

and comply with the Campus Administrative Policy 7015, *International Travel Policy for Students*. All students engaging in an international experience through the university must comply with all Office of Global Education policies and procedures.

5. Promoting/Advertising International Learning and Experiential Opportunities

Caution should be taken when promoting learning and experiential opportunities involving international travel that have not been vetted by the Office of Global Education and that are not affiliated with the university. If faculty or departments do list these providers and opportunities on university web sites or by other means, they must include the following disclaimer:

“[THE PROGRAM] is operated by an organization independent from and not affiliated with or sponsored by the University of Colorado Denver | Anschutz Medical Campus. Students who choose to participate in this program do so with the understanding that the university does not oversee, operate or manage this program and will not be liable to the student, family, heirs, or assigns under any circumstances for anything which may arise during the course of this program nor during independent travel that may occur before or after the program.”

6. Legal/Regulatory, Research, and Policy Compliance for International Travelers

All international travelers traveling under the auspices of the university are expected to comply with laws of foreign nations while traveling, working and transacting business abroad. Legal codes of foreign nations may differ from those of the U.S. and the traveler is responsible for compliance with these regulations.

- a. Travel to Office of Foreign Asset Control (OFAC) Sanctioned Nations

Federal export and sanctions regulations prohibit the

unlicensed export of specific commodities, software, technology and payments to or from certain countries, entities, and individuals for reasons of national security, foreign policy or protection of trade. University international travelers are required to comply with United States export and sanctions regulations when traveling abroad with commodities, software, and technology. When traveling with such items or information to **countries of concern, or where there are [embargoes or sanctions](#)**, travelers must notify the Office of Export Controls.

b. Human Subject Research Compliance

Any proposed human subject research study to be conducted by faculty, employees or students of CU Denver | CU Anschutz (or one of the Affiliates) must be reviewed and approved by the Colorado Multiple Institutional Review Board (COMIRB) or an appropriate IRB designated by COMIRB even if the research will be conducted in another country. In addition, international human subject research must be determined to be culturally appropriate and in compliance with the laws and conventions of the foreign nation(s) concerned. For more information visit the [COMIRB website](#)

c. [Institutional Animal Care and Use Committee \(IACUC\)](#)
Compliance

Compliance with animal care and use protocols in international sites is the responsibility of the traveler. There may be requirements to comply with both university and U.S. regulations as well as a requirement to comply with regulations in the foreign nation. International transport of animals, animal parts, animal blood and fluids is subject to restrictions according to U.S. law and possibly the laws of other nations. [Contact the IACUC](#) for information.

d. Compliance with Departmental and Program Protocols

Certain departments and programs have established protocols

for participation in international internships, clinical rotations, practicum and other international learning or adventure experiences. Employees should be aware of and follow department- or program-specific protocols in addition to those outlined in this policy

e. Consequences for Policy Violation

Individuals or the individual's sponsoring department/unit who do not abide by this policy may incur, among others, fines, loss of funding, financial consequences resulting from an adverse event, university sanctions, or the inability to receive support services from the university in emergency situations. Employees may also be subject to human resources disciplinary processes.

Notes

1. Dates of official enactment and amendments:

January 1, 2013: Adopted by the Provost

June 6, 2018: Modified

January 1, 2023: Revised

2. History:

June 6, 2018: Modified to reflect a Campus-wide effort to recast and revitalize various Campus policy sites into a standardized and more coherent set of chaptered policy statements organized around the several operational divisions of the university.

June 2, 2021: Modified from employees (faculty and staff) to all university business travelers.

3. Initial Policy Effective Date: January 1, 2013

4. Cross References/Appendix:

- [Administrative Policy Statement \(APS\) 4024, Travel Authorization](#)
- [Procurement Service Center Procedural Statement: Travel](#)
- [University Risk Management International Travel](#)

Administrative Note: All appendices were deleted and the URM website is now referenced whenever waivers are mentioned.