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|  | FGCU POLICY 2.020 | Responsible Unit: |
| | International Travel | Office of the Provost |

A. POLICY STATEMENT

The University is committed to providing students, faculty, and staff with access to global opportunities and experiences, which reveal a path to becoming globally minded citizens and promote student success. Travel provides unique and invaluable opportunities for members of the University community. International Travel also entails certain risks for Travelers and the University. The University is committed to the health, safety, and security of all members of its community who travel outside the United States of America. The goal of this Policy is to ensure that a consistent set of standards and expectations associated with University-Sponsored International Travel is followed by all units of the University.

B. REASON FOR POLICY

This Policy describes responsibilities of faculty, staff, and students when undertaking University-Sponsored International Travel, and establishes processes to help ensure that risks associated with International Travel are identified, acknowledged, and managed appropriately. This Policy seeks to enable consistent planning, operation, and response; provide quick and consistent institutional support for University-Sponsored global activities in the event of crises; and reduce risk to students, faculty, staff, and the University.

C. APPLICABILITY AND/OR ACCOUNTABILITY

This Policy applies to all faculty, staff, and students who request University authorization to travel internationally for academic, teaching, research, service, or official job-related purposes, and to persons who engage in University-Sponsored International Travel whether employed by the University, or travelling in a non-compensated capacity, such as Volunteers. This includes any International Travel on behalf of the University that is funded, supported in non-financial ways, approved, managed, or affiliated through a University unit.

This Policy does not apply to International Travel programs sponsored by other FGCU affiliated entities that procure travel services through third parties, primarily for community members, such as those offered by the Alumni Association or Renaissance Academy, or to personal International Travel.

D. DEFINITION OF TERMS

1. *Authorized University Travel (Travel)*: Any International Travel that is supported or sanctioned by the University through any funding source, provision of University

resources, and signature of a University employee or solicitation for participation by a University employee within the scope of his or her official duties.

2. *Authorized University Traveler (Traveler)*: Either a currently enrolled student or a full-time or part-time employee, or Volunteers, who is authorized by the University to travel internationally on bona fide University business or educational purposes.
3. *Export Control*: U.S. laws restricting the shipment, transmission, and transfer of certain items, software, technology, and services from the United States to foreign countries, and the restriction of “deemed exports,” which are releases of controlled technology and software source code, visually or verbally, to foreign nationals located in the United States.
4. *High-Risk Destination*: Countries, regions, or cities under current United States Department of State Travel Advisory Level 3 or Level 4, or a Centers for Disease Control and Prevention (CDC) Travel Health Notice of Warning Level 3. The University may also apply the designation “High-Risk” to locations that pose a specific health, safety, or security concern as indicated by sources other than the U.S. Department of State and Centers for Disease Control and Prevention, such as individual U.S. embassies or consulates, the World Health Organization, insurers or travel providers.
5. *International Travel*: Travel to destinations outside of the fifty (50) United States. Territories of the United States, such as Puerto Rico and the United States Virgin Islands, are included in this definition of International Travel.
6. *Minor*: An individual younger than eighteen (18) years of age at time of proposed travel.
7. *Personal Deviation (Sojourn)*: any activity not related to the Authorized University Travel or the purpose of the trip.
8. *Sanctioned Countries or Sanctioned Entities*: Countries and entities subject to United States trade or economic restrictions. The lists of Sanctioned Countries and Entities are administered by the U.S. Treasury Department’s Office of Foreign Assets Control (OFAC), U.S. Department of Commerce Bureau of Industry and Security Lists of Parties of Concern, and the International Traffic in Arms Regulations (ITAR).
9. *Study Abroad*: A University-approved international experience for academic credit in which students participate, either in a group or independently, with prior approval from the Office of Global Initiatives and International Services (OGIIS).
10. *Third Party Providers*: Entities not affiliated with the University who provide services (typically via contract) to students, employees, or units to facilitate their engagement in International Travel. Third Party Providers are independent contractors not employed by the University.

11. *Travel Advisory*: A *communiqué* issued by the United States Department of State to identify and assess a particular country or region where short-term events or long-term conditions could impact travel. Advisories include incremental levels of conditions and concerns, such as inclement weather, natural disasters, demonstrations, political activities, outbreaks of contagious disease, unstable government, civil war, ongoing intense crime or violence, embassy closures, or frequent terrorist attacks that may make travel challenging or pose dangerous risks to the security of United States citizens.
12. *University-Sponsored International Travel*: Academic or business travel taken by faculty, staff, and students, or Volunteers, authorized, funded, coordinated, or administered by the University. Such travel may include, but is not limited to, teaching, research, consulting, co-operative programs, 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.
13. *Volunteers*: For purposes of this Policy, this encompasses any non-compensated appointment with the University including, but not limited to, volunteers, courtesy faculty, emeritus faculty, interns, or retirees, that engages in International Travel as defined by this Policy.

E. PROCEDURES

1. General Requirements

- a. Travelers must complete an Export Control review through the Office of Research and Sponsored Programs as the first step in the authorization for International Travel by completing the Travel Authorization Request form forty-five (45) days prior to International Travel, if possible.
- b. Travelers are required to comply with all federal Export Control laws in accordance with United States export and sanctions regulations when traveling abroad with commodities, software, or technology, and comply specifically with FGCU Policy 2.014, Export Control.
- c. No travel to Sanctioned Countries or business interaction with Sanctioned Entities may be conducted without prior approval from the federal government and the Provost. A current list of Sanctioned Countries can be found at the Office of Foreign Asset Control website. Additionally, Travelers must comply with the Cuban Assets Control Regulations (CACR) codified at 31 CFR part 515 that govern most transactions between Cuba and the United States, including travel to Cuba.
- d. Travelers receiving approval to travel to Sanctioned Countries or engage in business with entities subject to the administration and enforcement of United States economic embargoes and trade sanctions must work with the Office of Research and Sponsored Programs to determine and acquire proper authorization from the appropriate

government agency or agencies, as applicable. Travelers should keep in mind that all activities with Sanctioned Countries require significant advance planning, and should contact the Research Compliance Coordinator in the Office of Research and Sponsored Programs as soon as possible when considering travel to Sanctioned Countries.

- e. International Travel paid from sponsored research funds, including federal grants and contracts, must be approved by the Office of Research and Sponsored Programs. Travel, funded in part or in full through federal grants or contracts, must comply with the transportation requirements established in the Fly America Act.
- f. Travelers are permitted to participate in University-Sponsored Travel to High-Risk Destinations only after obtaining written approval from the Vice President of their division.
- g. Travelers are required to register for travel insurance which includes coverage for medical emergencies for covered injuries and sickness; evacuation for natural disasters and emergency situations; trip interruption and cancellation benefits, and 24-hour travel, safety and security assistance services. Employees and Volunteers travelling on University-Sponsored Travel are covered by the University's currently approved international business travel insurance blanket policy but must register for this benefit for incidents and medical support incurred during International Travel. OGIIS will contact travelers with insurance registration details after the travel authorization request has been approved.
- h. Based on the location of the travel and specific exclusions, some Travelers may not be able to participate in the University travel insurance. The Traveler will be notified if this is the case by email following approval of their travel authorization request.
- i. Employees and Volunteers traveling internationally with students or facilitating experiential education abroad must read and abide by guidelines on pre-departure orientation for University faculty, staff, and students participating in University-Sponsored International Travel. University employees may not solicit student participation in any International Travel not affiliated with the University.

2. Student International Travel

- a. Students participating in any University-Sponsored Travel must be in good academic standing and in compliance with all University policies and procedures, including FGCU Regulation 4.002, Student Code of Conduct and Student Conduct Review Process, and FGCU Regulation 4.001, Student Rights and Responsibilities Code.
- b. With the exception of co-sponsored International Travel in which Florida Gulf Coast University collaborates with another college or university to provide a Study Abroad experience, only currently enrolled students at the University may travel

internationally as part of a University-sponsored Study Abroad, University-sponsored student group, or other for-credit or extra-curricular program. Students must be appropriately registered with the University to participate in these experiences. In the case of co-sponsored International Travel with another University, students that are not enrolled at Florida Gulf Coast University will be governed by the policies of their home institution. Students are not permitted to have personal guests or dependents accompany them in these programs. Only Authorized University Travelers, as designated by the University, may accompany these traveling student groups, except as approved in writing by the Provost or President.

- c. Students participating in international internships for which the University will award academic credit may travel unaccompanied as long as the student completes all University internship program requirements, including signing University liability waivers or releases, as applicable, before traveling to the internship location, registering the international internships with the sponsoring unit, and completing a pre-departure orientation with the OGIIS.
- d. This Policy prohibits student activities in countries for which a U.S. State Department Travel Warning is in effect and in other High-Risk Destinations.
- e. Students who are Minors at time of International Travel are not eligible to participate in University-Sponsored Travel unless approved by the Provost. However, they may be eligible to participate in International Travel programs sponsored by Third Party Providers coordinated by the OGIIS.

3. Students Traveling Independently

The University is not responsible for currently enrolled students who travel internationally independently from University-Sponsored Travel or for Personal Deviations or Sojourns from University-Sponsored Travel. In addition, the University is not obligated to award University credit retroactively for any international experience for which the student did not seek and receive formal approval from the University in advance of travel.

4. Risk Management and University Response

- a. The University reserves the right to issue an instruction that all University Travelers evacuate a given location when, in its sole judgment, conditions have changed to the extent that continued presence in that location endangers the health, safety, or security of participants.
- b. The Provost and Vice President for Academic Affairs, or designee, in consultation with additional experts, as needed, will evaluate the conditions at a given travel location and make recommendations regarding trip interruption and/or evacuation. If a Traveler does not heed a University instruction to evacuate, that individual does so at their own risk, may forfeit insurance coverage, academic credit, tuition payments,

or expense reimbursement, may be held responsible for additional expense incurred by the University, and may be subject to disciplinary action under University regulations and policies.

- c. The Assistant Vice President for Global Initiatives will immediately convene an *ad hoc* committee comprised of University personnel with relevant expertise depending on the particular risk(s) being considered when International Travel-related risk is identified. The *ad hoc* committee will address International Travel-related risk and make recommendations regarding such travel including, but not limited to, the following circumstances:
- 1) To advise on determinations regarding travel by students, faculty, or staff proposing to travel to High-Risk Destinations; or
 - 2) To assess risks associated with proposed International Travel where there is a specific concern of risk, apart from the U.S. Department of State or CDC warnings, and advise the Provost and Vice President for Academic Affairs, and the Vice President for Student Success and Enrollment Management on decisions to travel or not travel to the destination, or steps to be taken to mitigate risk.

5. Penalties for Non-Compliance with Policy

University employees who fail to comply with this Policy and its related administrative, financial, risk and safety procedures, and other requirements that may be set forth periodically by the University may be subject to discipline through the University, up to, and including, suspension of University International Travel privileges and/or termination of employment.

Authority

BOG Regulation 1.001, University Board of Trustees Powers and Duties

History of Policy

New 11/13/20

APPROVED

*s/Michael V. Martin
Michael V. Martin, President

November 13, 2020
Date