

Policy & Procedure Review

New Revision

Title: International Travel

Summary: This new policy enhances CWU's current travel policy (CWUP 2-10-150 Student and Employee Travel). The proposed international travel policy is structured to more clearly define what constitutes University-related international travel, the responsibilities of various parties across campus, incorporate the insurance mandate for students approved by BOT in December 2014, address travel to high-risk destinations and define the details of education abroad programs and other international travel.

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CWUP 2-10-??? International Travel

I. Introduction

The mission of the University is to prepare students for enlightened, responsible, and productive lives; to produce research, scholarship, and creative expression in the public interest; and to serve as a resource to the region and the state through effective stewardship of university resources. In support of this mission, the University supports the interests of students, faculty and staff in pursuing international research, educational activities and service and recognizes that important work may sometimes take place in locations that pose unusual health and safety risks. The University recognizes that travelers have significant responsibility for their own health, safety and security. This policy defines basic institutional requirements that will promote these interests.

Individual travelers are responsible for compliance with this international travel policy. *Units* sponsoring Central Washington University Related Travel (defined below) are responsible for **informing** travelers of this international travel policy and for **facilitating** compliance for individuals where appropriate.

II. Definitions

- a. **Travel Abroad, or International Travel** (hereinafter used interchangeably), refers to destinations outside the continental United States, Alaska, Hawaii and the District of Columbia. Travel to US territories, including American Samoa, Guam, Northern Mariana Islands, Puerto Rico, the US Virgin Islands and the US Minor Outlying Islands, as well as journeys on the High Seas are also considered international travel.
- b. An international experience is considered a **CWU-Sponsored or -Organized Program** when a University unit is involved in creating, funding or approving the experience, or coordinating the applications and selection of the participants.
- c. **CWU Related Travel (CWURT)** is defined in terms of two traveler roles:
 1. CWU Employees (Faculty and Staff):

CWU employees traveling abroad within the context of their job responsibilities—as defined by their employment contract—and/or under the terms of a University contract, agreement or partnership are considered to be on CWURT. This includes, but is not necessarily limited to, travel related to CWU-Sponsored or -Organized programs, conferences, site visits, meetings, guest lecture opportunities, approved sabbatical projects, and research funded, facilitated or supported by the University, as well as travel for sponsored projects. While receipt of CWU funds or CWU-managed funds for travel automatically classifies that travel as CWURT, such funding is not necessary to identify travel as CWURT.

While travel might include personal activities outside of the employee's job responsibilities, the travel is considered CWURT if the primary purpose is work-related. However, the University cannot and will not extend liability coverage for the unrelated personal activities.

Personal travel on vacation, without University support and where University employment is not relevant to the activity, is not considered CWURT.

2. Students:

Student participants in International Travel include both matriculated CWU students and individuals admitted to the University as non-matriculated students. Students are considered to be on CWURT if they meet one or more of the following criteria:

- a) Receives CWU resident or accepted transfer credit for the experience.
- b) Travels on a CWU Sponsored or Organized experience.
- c) Travels to achieve a degree requirement, including—but not limited to—degree milestones, thesis field research, practica, internships, etc.
- d) Travels under the terms of an institutional contract or agreement.
- e) Receives funding from a CWU unit or receives funds managed by CWU for their travel, including—but not necessarily limited to—Services and Activity Fee Committee support, Graduate Studies grants and departmental scholarships.
- f) Participates in travel designated as an official activity of a registered or approved student organization or club.

d. **Education Abroad** refers to various credit-bearing and non-credit international education programs that also may be considered either a CWU Sponsored or Organized Program or CWURT. Examples include, but are not necessarily limited to:

1. University reciprocal exchanges.
2. Faculty-directed programs, whether conducted entirely or only in-part abroad.
3. Study, internship and/or research abroad, whether through an affiliated third-party sponsor or through a self-arranged opportunity.
4. Experiential activities, such as service, leadership and/or performance programs.

Any education abroad program, credit-bearing or not, consisting of one or more CWU students, undergraduate or graduate, traveling with and under the direction, leadership or guidance of one or more CWU employees shall be considered a **faculty-directed program**. These shall include, but not necessarily be limited to, traditional course-based programs, as well as service-learning, internship and research programs.

III. Responsibilities

a. Administration (President, Cabinet, Associate Provosts, Deans, Office of International Studies and Programs, International Studies and Programs Advisory Council)

The University administration is responsible for:

1. Developing, implementing and maintaining all policies and procedures regarding International Travel that are consistent with Washington State law, national norms and best practices, are transparent to all faculty, staff and students and uphold the academic standards and expectations of professional conduct of the University and its employees.
2. Per OFM State Administrative and Accounting Manual (SAAM) Subsection 10.10.50.b, review and approval of all CWU Related Travel.

3. Final determination of any and all education abroad opportunities to be offered to students.

These responsibilities include attention to faculty, staff and student risk and the management of institutional risk as appropriate.

b. Office of International Studies and Programs/Study Abroad and Exchange Programs (OISP/SAEP)

In addition to their role as part of the University administration, the Office of International Studies and Programs and its subunit Study Abroad and Exchange Programs, collectively are responsible for:

1. Serving as the coordinating unit for all education abroad programs.
2. Implementing University policies and procedures regarding Student CWURT, including those for the character, development and administration of education abroad programs.
3. Facilitating review of all University education abroad programs and opportunities and establish related procedures and timelines. Such review is required before any education abroad program or Student CWURT may be advertised or represented as approved by or sponsored by the University.
4. Implementing the student Travel Health Preparation Guide and process.
5. Implementing the Disciplinary Clearance review form and process.
6. Registering faculty directors and students for USDOS Smart Traveler Enrollment Program (STEP) or advise them on self-registry.
7. Enrolling faculty directors and students in the University's default international health and emergency insurance coverage.
8. Implementing insurance waiver request processes, in accordance with Washington State law and University policy.
9. Implementing emergency response procedures for student CWURT.
10. Facilitating all general communication and liaison duties between CWU and international partners.
11. Facilitating review and approval of all international agreements and contracts, including those with US-based vendors providing services for education abroad programs.
12. Providing to students general consultation on entry and exit requirements, including—but necessarily limited to—passports, visas and travel as a DACA or otherwise undocumented student.

c. Faculty and Staff

1. Per SAAM Subsection 10.10.15, faculty and staff are responsible for being familiar with University and State travel regulations and procedures.
2. Per SAAM Subsections 10.10.15 and 10.10.50.a, all faculty and staff participating in CWURT abroad must register their travel, regardless of funding, by completing a Travel Authorization prior to departure. Related deadlines may be set by the University administration.
3. All faculty and staff participating in CWURT abroad are responsible for understanding and following all entry and exit requirements for the United States and their destination(s) abroad, including—but necessarily limited to—passports and visas.

4. All faculty and staff participating in CWURT abroad must register themselves for the USDOS Smart Traveler Enrollment Program (STEP) unless part of a group enrolled by OISP/SAEP.
 5. Faculty and staff wishing to travel to visit any of the countries or entities included on [lists](#) of embargoed countries or Specially Designated Nationals maintained by the US Department of the Treasury's Office of Foreign Assets Control are responsible for ensuring compliance with all US export control laws and regulations.
 6. Faculty and staff traveling on federally sponsored programs are responsible for ensuring their air travel complies with the Fly America Act.
 7. Faculty and staff wishing to create a faculty-directed education abroad program shall work with SAEP, follow all related policies, procedures and guidelines and adhere to all requirements of faculty program directors, including mandatory trainings.
 8. Faculty are responsible for appropriate advising and evaluation of credit-transfer equivalency for course credits earned at international sites in accordance with University or college policies.
- d. Students

All students participating in any CWURT must:

1. Register their travel with the OISP/SAEP according to its policies and procedures.
2. Attend required orientations and pay applicable tuition, administrative and program fees.
3. Comply with policies and procedures regarding academic advising and risk management.
4. Obtain, as appropriate, academic advising in order to ascertain whether credits earned abroad will be accepted as transfer credit by the University.
5. Obtain University-approved international health and emergency insurance coverage for the duration of their travel.
6. Abide by all applicable University, host institution and/or program regulations and policies.
7. Understand and follow all policies, procedures and requirements related to entry to and exit from the United States and the program location(s).

IV. International Health and Emergency Insurance

All faculty, staff and students participating in CWURT abroad must purchase international health and emergency insurance for the full duration of CWURT. Travelers will be enrolled in the University's contracted provider and billed as appropriate to their category of CWURT.

Pursuant to RCW 28B.10.660(3), students may request a waiver of the default coverage provided they demonstrate comparable aggregate coverage from one or more alternate sources. Granting of a waiver shall be at the discretion of OISP/SAEP and shall set neither individual nor general precedent. Students are encouraged, but not required, to purchase insurance covering such things as flight delay, travel interruption, etc.

Regardless of alternate coverage, no waiver of this requirement shall be available to CWU faculty and staff on international CWURT.

V. Emergency Evacuation Insurance and Support

Medical and security evacuation coverage is included in the University-contracted insurance policy and is among the University's minimum requirements for alternate coverage. The decision to activate evacuation support under this coverage is ultimately made by the provider in consultation with the University. Severity of security concerns, weather conditions and remoteness of location may limit the degree to which the provider is able to assist in an emergency.

VI. Travel in Areas of Concern

The University reserves the right to deny permission to travel to any destination subject either to a current Level 3 or 4 USDOS Travel Advisory or to a Centers for Disease Control and Prevention (CDC) Travel Health Warning. The University will consider proposals on a case-by-case basis.

For the purposes of this policy a country or non-state region (e.g. Gaza, Taiwan) shall be considered subject to a Level 3 or 4 Travel Advisory if either advisory level is applied to the country or region generally or to any of its sub-regions, regardless of whether the destination falls within the affected sub-region or not. It is not necessary for sub-regions to be explicitly labeled "Level 3" or "Level 4" for this requirement to apply; it is sufficient for advisory language to be consistent with those levels.

a. Individual Employee Travel

1. Travelers are responsible for checking their destinations for any USDOS Travel Advisory or CDC Travel Health Warning/Alert.
2. Units cannot require unwilling employees to travel on CWURT to countries or locations subject to a Level 3 or 4 Travel Advisory or a Travel Health Warning.
3. Travelers are responsible for understanding their insurance coverage(s) and needs that may exceed current coverage and require purchase of additional insurance.
4. Travelers are responsible for submitting prior to departure a safety plan for destinations subject to a Level 3 or 4 Travel Advisory or a Travel Health Warning, though the travel is not subject to review by the Threat Assessment Team.

b. Students

1. Students cannot be required to participate in any international travel experience in destinations subject to a Level 3 or 4 Travel Advisory or a Travel Health Warning. If international travel is required for a student's degree requirement, an alternate destination should be arranged or permitted.
2. All student CWURT to destinations subject to Level 3 or 4 USDOS Travel Advisory or CDC Travel Health Warning must be reviewed and approved by the CWU Threat Assessment Team (TAT) in cooperation with OISP. Students are responsible for submitting petitions for individual travel. Education abroad program directors or a sponsoring-department official are responsible for submitting petitions for all group travel programs. Approval must be obtained before such programs may be advertised to students.
3. All student CWURT to destinations subject to Level 2 USDOS Travel Advisory or CDC Travel Health Alert necessitates submission of an individual or group safety plan, but is not subject to additional review by TAT.
4. TAT approval of student travel plans is not intended to guarantee student safety or to assume the responsibility of students for planning for their own safety. Students will

sign a supplemental acknowledgement of risk and release of liability, recognizing voluntary participation in the program.

5. Students will adhere to any applicable provisions of this policy during breaks or other personal travel falling within the official start and end dates of their program.
6. Severe security and safety concerns may result in the suspension of an education abroad program and withdrawal of all participants from the region or amendment of the program curriculum, with assistance provided by OISP/SAEP and other departments as necessary.
7. Students wishing to stay behind despite a decision to cancel their program and initiate evacuation will sign an additional release acknowledging their choice to stay against advice.

VII. Employee Companion Travel

a. Individual (non-Education Abroad) Employee Travel

1. The University takes no responsibility for and liability coverage shall not be extended to employee companions.
2. Companions shall have no responsibilities on behalf of nor be considered a representative of the University. Companions may be present for official activities only when specifically authorized.
3. Companions may neither impede official University business nor imply official status with the University.
4. Travel arrangements are solely the responsibility of the companion and/or employee. No University resources may be employed to make or facilitate companion arrangements. The needs of the University shall dictate travel schedules and arrangements; companions are expected to adapt to those needs.
5. Expenses incurred by a companion are solely the responsibility of the companion and/or employee. Should the presence of the companion cause the University to incur any expenses above those the employee would have incurred individually, the University must be reimbursed for the difference.
6. Companions are encouraged to carry insurance that includes, among others, coverage for medical and security evacuation and repatriation of remains. In the event of an emergency, the University shall accept no responsibility and incur no costs for companions.

b. Education Abroad Programs

1. All items within the previous section (§VII.a.) apply equally to this section. Additionally:
2. It is recognized that education abroad programs, whether credit or non-credit, are academic programs containing a travel component and not trips or vacations.
3. Unless a University employee designated as a program co-leader, spouses or dependents of program directors/leaders are discouraged from traveling with University Education Abroad programs. Exceptions may be made for programs of extended duration, i.e. min. full quarter, requiring the program director(s)/leader(s) to be on-site for the full duration.
4. Only the official program director(s)/leader(s) and students fully enrolled in the program may participate in education abroad program activities and travel on program-secured transportation.

VIII. Operating Motor Vehicles

The University shall neither accept responsibility nor extend liability coverage for students operating motor vehicles (including, but not necessarily limited to, scooters, motorbikes, motorcycles and automobiles) while participating in an education abroad opportunity. Faculty-directed education abroad programs are prohibited from allowing students to operate motor vehicles hired by or for the program at any time.

Faculty and staff may not drive vehicles in which students are passengers abroad without an approved exception from the Director of Business Services and OISP. Faculty and staff who need transportation for students must either use public transportation or hire a local driver/vehicle with appropriate insurance.

IX. Travel in Violation of This Policy

a. Faculty and Staff

Faculty and staff who choose to travel in violation of this policy are acting without authorization by the University. They will be liable for any and all costs associated with travel, assume all liability for incidents that may occur during this travel, and are not eligible for University support of any kind.

Travel Authorizations completed after the fact will be denied unless sufficiently compelling mitigating circumstances are determined to exist.

b. Students

Students who choose to travel in violation of this policy are acting without authorization by the University. If travel occurs during a required term, students must take a leave of absence from the University. Students who travel in violation of the policy could jeopardize their student status.

In all cases, students who travel in violation of this policy are ineligible for financial aid, scholarships and travel stipends from or through the University, as well as any other University support including credit of any kind.

X. Exclusions

a. Personal Travel

This policy does not apply to personal, non-University travel by faculty, staff or students, including travel outside of official education abroad program dates.

b. Athletic Competition in British Columbia

Student-athletes participating in or traveling for competition in British Columbia as part of a team's official schedule are exempt from this policy. International travel to any other destination, regardless of purpose, is subject to this policy.

Athletic Department personnel are responsible for attaching a roster of traveling student-athletes to their Travel Authorization, as well as certifying student-athlete insurance includes emergency services, such as medical and security evacuation and repatriation.

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