



**Policy Title: Baylor University Global Safety and Security Policy**

**Policy Number:**

**Date Issued: July 7, 2020**

**Responsible Executive: Director of Global Safety and Security**

**Date Last Revised: July 7, 2020**

**Responsible Office: Global Safety and Security**

## **Baylor University Global Safety and Security Policy**

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### **Policy Statement**

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Baylor University (the “University”) supports and encourages travel and collaborations and recognizes that a global perspective is essential to its academic and faith-based mission. To this end, the University has established a broad global presence through programs involving domestic and international study, research, partnerships, faculty-led trips, and student opportunities for study abroad, student exchange, service learning, and missions programs.

Baylor University endeavors to balance the value of participation in domestic and international activities against the potential health, safety, and security risks to its students, faculty, staff, and guests, and to ensure institutional compliance with applicable regulatory programs through the establishment of a robust and efficient global health, safety, and security framework.

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### **Reason for the Policy**

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This policy establishes University requirements for global engagement with the goal of maximizing personal health, safety and security, compliance with applicable regulations and standards, and consolidating travel health, safety and security, training, and reporting requirements.

Therefore, the University:

- Takes appropriate precautions to mitigate the risk to the health, safety, and security of all students, faculty, staff, and guests while representing the University globally
- Carries out threat and hazard identification and risk assessments on a regular basis
- Puts in place procedures to prevent incidents and provide adequate control of health, safety, and security risks arising from global travel

- Provides adequate training to ensure faculty, staff, students, and guests are competent to travel in a safe and healthy manner and can address travel-related risks while on University sponsored travel
- Monitors the well-being of students, faculty, staff, and guests on travel status and provides 24/7 access to security support for University travelers
- Implements emergency procedures in case of incidents
- Evaluates and provides access to adequate healthcare and medical emergency plans for University travelers
- Ensures that all incidents are reported according to a fixed reporting matrix including medical events which occur while on University sponsored travel

There are a number of regulations and standards that apply to University travel and include, but are not limited to:

- Clery Act
- Title IX
- Family Educational Rights and Privacy Act (FERPA)
- Americans with Disabilities Act (ADA)
- Health Insurance Portability and Accountability Act (HIPAA)
- Foreign Corrupt Practices Act
- Export Administration Regulations (EAR)
- Fly America Act
- Open Skies Agreements
- International Traffic in Arms Regulations (ITAR)
- Office of Foreign Asset Control Regulations (OFAC)
- The Forum on Education Abroad Standards of Good Practice for Education Abroad (Standard 8)

This policy and related procedures comply with a new process the U.S. Department of State (“USDOS”) announced in 2018 to inform citizens of international travel health and safety risks. The USDOS Travel Advisories replace a prior system of Travel Alerts and Warnings.

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### **Individuals/Entities Affected by this Policy**

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This policy applies to Baylor University academic and administrative institutions and to all students, faculty, staff, and official guests participating in University-sponsored travel.

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### **Exclusions**

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NONE

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### **Related Documents and Forms**

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### **University Policies and Documents**

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University policies and documents that may be affected by the Baylor University Global Safety and Security Policy may include, but are not limited to, the following:

2. Baylor University Global Safety and Security Policy

- [Baylor University Personnel Policies & Procedures](#)
- [Baylor University Student Policies & Procedures](#)
- [Baylor University Faculty Handbook](#)
- [Baylor University Travel and Entertainment Policies and Procedures](#)
- [Baylor University Study Abroad Program Director Policies](#)
- [Guidelines for Baylor University Mission Trips](#)
- [Baylor University Missions Financial Policies](#)
- [Baylor University Missions Team Leader Manual](#)
- [Baylor University Missions Student Organization Leader Handbook](#)
- [Baylor University Export Compliance Policy BU-PP-041](#)
- [Baylor University Title IX Policies](#)
- [Baylor University Clergy Policies](#)
- [Baylor University Protection of Minors Policy](#)
- [Baylor University Officer, \(and\) Administrative Employee and Other Employees Conflict of Interest Policy BU-PP 800](#)
- [Baylor University Faculty Conflict of Interest Policy BU-PP 700](#)

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## Definitions

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These definitions apply to terms as they are used in this policy.

<p><b>Centers for Disease Control Warning Country</b></p>	<p>Provides travelers with clear, timely, and reliable health information worldwide. Under this system, the Centers for Disease Control and Prevention (CDC) provides levels of advice ranging from Watch Level 1 through Warning Level 3.</p> <p>(a) Level 1 Watch: Usual baseline risk or slightly above baseline risk for destination and limited impact to the traveler (Reminder to follow usual precautions for this destination/Green).</p> <p>(b) Level 2 Alert: A country designated by the CDC as having an increased risk in defined settings or associated with specific risk factors; certain high-risk populations may wish to delay travel to these destinations (Follow enhanced precautions for this destination/Yellow).</p> <p>(c) Level 3 Warning: A country designated by the CDC as having a high risk to travelers (Avoid all nonessential travel/Red).</p>
<p><b>Domestic Travel</b></p>	<p>Includes travel throughout the 48 contiguous United States, in addition to Alaska and Hawaii. Domestic travel does not include territories under the control of the United State (e.g. American Samoa, Guam, Northern Mariana Islands, Puerto Rico, U.S. Virgin Islands)</p>
<p><b>Forum for Education Abroad Standards</b></p>	<p>The Forum on Education Abroad is recognized by the U.S. Department of Justice and the Federal Trade Commission as the <a href="#">Standards Development Organization (SDO)</a> for the field of education abroad. As such, it is The Forum's responsibility to monitor changes in our field of professional practice and maintain, update, and promulgate the <i>Standards of Good Practice for Education Abroad</i> according to the needs of our field.</p> <p>Our process for developing and updating standards prioritizes the core principles of due process for standards development as identified by the American National Standards Institute (ANSI): Openness, Lack of Dominance, Balance, Coordination and Harmonization, Consideration of View and Objections, Consensus Vote and Appeals. Persons directly or</p>

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	<p>materially affected by the <i>Standards</i> have the opportunity to have their voices heard in this important process.</p> <p>Baylor University remains an active member of the Forum and therefore seeks to support and adhere to the Standards put forth.</p> <p><a href="https://forumea.org/resources/standards-of-good-practice/">https://forumea.org/resources/standards-of-good-practice/</a></p>
<b>International Travel</b>	Includes any travel with a destination(s) outside the 48 contiguous United States, Alaska, and Hawaii.
<b>Travel Advisory</b>	<p>Formal advice about particular destinations issued by:</p> <ul style="list-style-type: none"> <li>(a) the United States Department of State (USDOS);</li> <li>(b) the Centers for Disease Control (CDC);</li> <li>(c) the World Health Organization (WHO);</li> <li>(d) or any commercial travel advice service engaged by the University.</li> </ul>
<b>U.S. Department of State Travel Advisory</b>	<p>Provides U.S. citizens with clear, timely, and reliable safety and security information worldwide. Under the current system, every country has a Travel Advisory, providing levels of advice ranging from 1 to 4.</p> <ul style="list-style-type: none"> <li>(a) Level 1 Country: A country determined by USDOS to be at the lowest advisory level for safety and security risk (Exercise Normal Precautions/Blue).</li> <li>(b) Level 2 Country: A country determined by USDOS to pose heightened risks to safety and security (Exercise Increased Caution/Yellow).</li> <li>(c) Level 3 Country: A country determined by USDOS to pose serious risks to safety and security (Reconsider Travel/Orange).</li> <li>(d) Level 4 Country: A country determined by USDOS to be at the highest advisory level due to greater likelihood of life-threatening risks (Do Not Travel/Red)</li> </ul>
<b>University-Sponsored Travel</b>	<p>Any educational, business, or athletic travel that is University-sponsored, University-administered, University-organized, or conducted within one’s capacity as a Baylor University representative, regardless of credit or funding. This includes:</p> <ol style="list-style-type: none"> <li>1. Any student traveling domestically or internationally for a University-sponsored, University-administered, or University-organized activity or program. This includes, but is not limited to: <ul style="list-style-type: none"> <li>(a) study abroad programs;</li> <li>(b) student exchange programs;</li> <li>(c) field studies;</li> <li>(d) research trips;</li> <li>(e) internships or practicums;</li> <li>(f) conferences, seminars, or meetings;</li> <li>(g) missions and service learning opportunities;</li> </ul> </li> </ol>

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	<p>(h) volunteer, experiential, or work programs organized, endorsed, or promoted by Baylor University; and</p> <p>(i) athletics team or individual travel.</p> <p>2. Faculty, staff, and official guests traveling domestically or internationally to conduct University business as a representative of Baylor University, such as participation in research, conferences, meetings, and teaching endeavors.</p>
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## Contacts

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Subject	Telephone	Office email/web site
Vice Provost for Global Engagement	254-710-2657	<a href="https://www.baylor.edu/globalengagement/">https://www.baylor.edu/globalengagement/</a>
Associate Vice President, Department of Public Safety	254-710-4619	<a href="https://www.baylor.edu/dps/index.php?id=866871">https://www.baylor.edu/dps/index.php?id=866871</a>
Associate Chaplain and Assistant Dean for Spiritual Life	254-710-3517	<a href="https://www.baylor.edu/spirituallife/">https://www.baylor.edu/spirituallife/</a>
Insurance Program Manager	254-710-4586	<a href="https://www.baylor.edu/risk">https://www.baylor.edu/risk</a>
Director of Study Abroad	254-710-2657	<a href="http://bearsabroad.baylor.edu/">http://bearsabroad.baylor.edu/</a>
Assistant Vice Provost for Research, Director of Compliance	254-710-1438	<a href="https://www.baylor.edu/export/">https://www.baylor.edu/export/</a>
Director of Global Safety and Security	254-710-8210	<a href="https://www.baylor.edu/dps/index.php?id=936756">https://www.baylor.edu/dps/index.php?id=936756</a>

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## Responsibilities

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<b>International Travel Committee</b>	The Baylor University Global Safety and Security Policy requires annual updates to ensure compliance with University policies and procedures, as well as changes to the global health, safety, and security environment. Policy updates will go before the International Travel Committee (ITC) for approval prior to formal submission to the Baylor University Policy Committee.
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## Principles

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Compliance with this policy is necessary to:

- Be covered by applicable insurance programs during domestic and international travel
- Receive University academic credit for domestic and international coursework, if eligible
- Receive available University assistance in the event of an emergency during travel

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- Avoid significant personal fines and potential prison sentences, domestically and internationally
- Avoid disciplinary action and/or limitations on future University travel
- Adhere to related applicable University, state, and federal policies, as well as international laws and regulations

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## **Section 1.0 University and Traveler Responsibilities**

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1.1 It is the responsibility of Baylor University travelers to assess and mitigate health, safety, and security risks when engaging in University-sponsored travel. Travelers must abide by all Baylor University and institutional policies governing domestic and international travel, as well as any relevant US and international laws governing international travel.

1.2 It is the responsibility of Baylor University to assess the health, safety, and security risks of University-sponsored travel, with special consideration for moderate and high-risk international travel. Baylor University must provide clear information to travelers about domestic and international travel policies, procedures, or requirements and any additional domestic and international travel guidelines or rules, including consequences for noncompliance.

1.3 Baylor University cannot guarantee any traveler will be allowed to re-enter the U.S. as planned. Entrance restrictions for visa holders and travel bans are unpredictable. Travelers and the units that support travel should plan accordingly.

1.4 Baylor University may deny or withdraw approval for University-sponsored international travel at any time due to changing circumstances within the country of travel. For example, without limitation, the University may withdraw approval of travel to any country for which the U.S. Department of State has issued a mandatory evacuation order. Any person traveling under this policy who is notified or otherwise becomes aware that the U.S. Department of State has issued a mandatory evacuation order for the country he or she is visiting should immediately contact the nearest U.S. Embassy or Consulate. Non-U.S. citizens should also contact the University sponsoring organization and/or Baylor University's 24-hour emergency line at (+1) 312-894-0095 as soon as possible. Text and iMessage communication is supported on the emergency line.

1.5 Additionally, the University may require undergraduate students to depart from a country earlier than planned due to safety factors. The University cannot ensure full cost and academic credit recovery to students in the case of a government- or University-mandated withdrawal or evacuation. However, the University will attempt to provide credit to students who comply with an evacuation order and will attempt to provide an opportunity to continue courses at an alternate location. The University may not offer credit to students who do not comply with an evacuation order.

1.6 Travelers on University-sponsored international travel must review and sign a Waiver and Statement of Responsibility, Release, and Indemnification Agreement. These forms are required unless traveling with an athletic team as a requirement of team participation. If an undergraduate student is a legal minor, a parent or legal guardian must sign a supplemental parental consent form. All forms are available within the Baylor University Travel Registry system.

1.7 It is the responsibility of each University traveler to conduct themselves consistently with all applicable University policies and procedures, including but not limited to:

(a) Baylor University Student Code of Conduct;

(b) Baylor University Faculty Handbook;

(c) Baylor University Policies, e.g., Personnel, Finance, and Procurement. These include issues such as means of travel, lodging, and payment for travel;

(d) Baylor University Center for Global Engagement Study Abroad Program Director Policies;

(e) Baylor Missions Policies and Procedures

1.8 It is the responsibility of Baylor University to provide health, safety, and security briefings to all travelers with international destinations designated by USDOS as Travel Level 2 through 4, or CDC Level 2.

(a) Individuals and groups traveling internationally on official University business to countries with a USDOS Travel Level 2 through 4, or CDC Level 2, are required to schedule a health, safety, and security orientation session with the Director of Global Safety and Security prior to departure.

(b) Individuals and groups traveling internationally on official University business to countries with a USDOS Travel Level 2 through 4, or CDC Level 2 may be required to attend additional trainings, orientations, or briefings prior to departure.

(c) Travel to CDC Level 3 countries is prohibited. Faculty and staff that wish to travel to CDC Level 3 destinations must submit itinerary proposals to the Director of Global Safety and Security for International Travel Committee approval. Additional waivers and approval by the University President or her designee may be required.

(d) All University group leaders, whether leading study abroad, missions, or service learning trips, shall attend a Group Leader Certification session. Certification is current for two years following the initial certification date.

(e) Baylor University's ability to assist travelers abroad is limited. For example, without limitation, outside a life-threatening medical or security emergency, there are no indemnified evacuation benefits for pandemic related situations. Travelers and sponsoring units must understand that travel can be risky and must be willing to assume all responsibility for unexpected and impactful conditions. All travelers must be prepared to remain abroad indefinitely and understand that doing so could impact their employment or academic momentum.

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## **Section 2.0 International Travel Authorization**

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2.1 Travel authorization is required for all Baylor University sponsored international travel.

2.2 Required action in advance of travel booking:

(a) **Faculty, Staff, and Student Travel:** Baylor University faculty, staff, and student international travel as part of a Baylor University program or sponsored by the University must be authorized in advance as follows, depending on the type of travel:

i. Participation in international study-abroad, exchange programs, student only travel for University academic credit, individual faculty and staff travel, or missions programs requires registration through the Center for Global Engagement or Baylor Missions.

ii. International faculty-led student study-abroad, exchange, student only, individual faculty and staff travel, and missions programs (USDOS Travel Level 1, CDC Level 1) require approval of the faculty/staff member's or student's Department Head, the College Dean, the Vice Provost for Global Engagement, Dean of Spiritual Life, and Vice President of Student Life.

iii. International faculty-led student study-abroad, exchange, student only travel, individual faculty and staff travel, and missions programs (USDOS Travel Level 2 through 4 destination or CDC Warning Level 2) require approval of the faculty member's or student's Department Head, the College Dean, the Director of Global Safety and Security, the Vice Provost for Global Engagement, Dean of Spiritual Life, and Vice President of Student Life.

iv. International faculty-led student study-abroad, exchange, student only travel, individual faculty and staff travel, and missions programs (USDOS Travel Level 2 through 4 destination or CDC Warning Level 2) may require a health, safety, and security site assessment in advance of approval by the Director of Global Safety and Security prior to ITC approval.



v. International faculty-led student study-abroad, exchange, student only travel, individual faculty and staff travel, and missions programs to USDOS Travel Level 4 and CDC Warning Level 3 countries is prohibited.

(c) **Travel Registration:** Baylor University will implement systems and procedures for registration of international travel information. Such information may be used in the event of an emergency to locate travelers and communicate emergency information. All University travelers are required to complete University procedures for travel registration no later than 10 working days in advance of travel.

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### **Section 3.0 International Travel Committee (ITC)**

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3.1 The Baylor University International Travel Committee (ITC) is comprised of representatives from the Center for Global Engagement, Study Abroad, Missions, University Compliance and Risk Services, Department of Public Safety, and Campus Health Services. The Director of Global Safety and Security serves as the chair of the ITC for Baylor University.

3.2 The ITC is responsible for review of travel to all USDOS Travel Advisory level 4 countries or countries with a CDC Travel Health Notice Warning Level 3: Avoid Nonessential Travel (“CDC Warning”). USDOS Travel Level 2 or 3 countries will be reviewed by the ITC on a case-by-case basis.

3.3 The ITC reserves the right to withdraw its approval of international travel at any time should conditions presented in a request for approval change materially. The Center for Global Engagement, Baylor Missions, the sponsoring administrative unit, program director or faculty/staff trip leaders, and individual travelers share the responsibility for monitoring conditions in approved travel locations. However, the Director of Global Safety and Security will direct communications to the sponsoring administrative unit when there is a change of condition that might prompt heightened awareness or travel modifications.

3.4 The Vice Provost for Global Engagement and Associate Chaplain and Assistant Dean for Spiritual Life are responsible for making all approval decisions based on the recommendations from the Director of Global Safety and Security on all University-sponsored international travel.

3.5 The ITC has the authority to require that travelers obtain a health clearance before taking part in any University-related international travel. Information from the health clearance process is confidential and is not used during the application process. Failure to submit a health clearance form by the deadline will result in the traveler entering the disciplinary action process, and may result in them being withdrawn from their program or travel cancelled **without** a refund.

3.6 Authorization of international travel based on USDOS travel advisory levels:

(a) **Travel Level 1 Countries**

Travel to countries with an overall USDOS Travel Advisory of Level 1 do not require additional review or authorization, although standard pre-departure requirements apply.

**(b) Travel Level 2 Countries**

Travel to countries with an overall USDOS Travel Advisory of Level 2 require additional review or authorization from the Director of Global Safety and Security and Vice Provost for Global Engagement on a country-by-country basis. Additional pre-departure requirements may apply.

**(c) Travel Level 3 Countries**

Travel to countries with an overall USDOS Travel Advisory of Level 3 requires review by the Director of Global Safety and Security and approval by the Vice Provost for Global Engagement. Units sponsoring group travel must obtain permission on behalf of its travelers. Additional training, pre-departure requirements, and waivers apply.

**(d) Travel Level 4 Countries**

Travel to countries with an overall USDOS Travel Advisory of Level 4 or a CDC Level 3 Warning is prohibited. Accordingly, the University will not grant academic credit or provide funds for any such travel. However, exceptions may be made on a case-by-case basis following review by the ITC. Additional training and pre-departure requirements apply. Potential applicants must obtain permission from the Vice Provost for Global Engagement before seeking review by the Director of Global Safety and Security and approval by the ITC and University President, or designee.

**(e) Exemption**

Baylor University students, faculty, staff, and guests (visa holders) who are returning to their home countries under a Level 3 or Level 4 advisory for University-sponsored experiences need not apply for Travel Permission, but proof of citizenship and permanent residency must be provided to the Center for Global Engagement at least six weeks prior to departure. Such travelers are still required to complete the standard pre-departure requirements.

**(f) High Risk Travel (USDOS Level 3 – 4 / CDC Warning Level 3)**

When reviewing High Risk travel recommendations from the Director of Global of Global Safety and Security, the ITC must carefully consider:

- the purpose, goals, and value of the travel;
- the health, safety, and security risks involved; and
- the risk management plan in place, including the University's ability to assist in an emergency.

(a) The ITC must provide advance written documentation for authorization of High Risk travel to ensure proper health, safety, and security mitigation strategies can be implemented.

(b) Planned travel that is not yet in progress when a destination becomes High Risk is automatically suspended pending review by the ITC.

(c) Travel that is in progress when a location becomes High Risk must be reviewed by the ITC within a reasonable timeframe to determine if the threat

is imminent and if travelers should be recalled or relocated. Ongoing review will continue for the duration of the travel.

(d) Travel that has been approved by the ITC may be subject to additional review if there is a change in circumstances and/or additional review is deemed necessary by the ITC.

(e) The ITC may withdraw travel approval at any time and for any appropriate reason.

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## **Section 4.0 Regulatory and Policy Considerations**

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### 4.1 Defense Base Act

(a) "Defense Base Act (DBA)" is a federal requirement governing insurance benefits that employers must provide to employees who travel abroad under the provisions of a federal contract or subcontract (does not include grants). Reference is CFR Title 42, Chp.11, §1651.

(b) University international travel by employees (not applicable to students or guests) under a federal agency service contract or for work performed on U.S. military bases abroad must be evaluated to determine if Defense Base Act (DBA) insurance coverage is required.

i. For international travel where the University is a contractor or subcontractor to any agency of the U.S. federal government, or when work will be conducted on any U.S. military base abroad, a requirement for DBA insurance coverage may be applicable. DBA is a specialized form of worker's compensation insurance that responds to injury, disability, or death of employees working abroad.

ii. These requirements are applicable only to employees, not students or guests, and the following provisions apply:

- [University Compliance and Risk Services](#) will provide guidance and training for departments to identify the need for DBA coverage during contract review and project planning.
- Scope of work, itinerary, and payroll data must be submitted by the traveler's home department and approved in order for DBA coverage to be established well in advance of the travel.

iii. DBA premiums are calculated based on payroll data and the number of days abroad. Unless otherwise specified, funding responsibility for DBA insurance premiums will be through University Compliance and Risk Services.

iv. Failure to obtain DBA coverage when required may result in financial penalties assessed against the University, which will be the responsibility of the employee's home department.

## 4.2 Fly America Act

(a) Under the Fly America Act published in Federal Travel Regulation §301-10.13 by the General Services Administration (GSA), only U.S. air carriers shall be used for all travel reimbursed from federal grants and contracts, including NIH grants. However, there are exceptions to using only U.S. air carrier services under the Fly America Act, depending on the scenarios shown below:

i. Generally, U.S. air carrier services that provide nonstop or direct service from the origin to the destination must be used, unless such use would extend travel time, including delay at origin, by 24 hours or more;

ii. Generally, U.S. air carrier services that do not offer nonstop or direct service between origin and destination must be used on every portion of the route where it provides service, unless when compared to using a foreign air carrier, such use would:

- Increase the number of aircraft changes outside the U.S. by two or more; or
- Extend travel time by at least 6 hours or more; or
- Require a connecting time of 4 hours or more at an overseas interchange point.

iii. When the costs of transportation are reimbursed in full by a third party, such as a foreign government or an international agency, U.S. air carriers do not have to be used.

## 4.3 In-Country Local Regulations and Laws

(a) Travelers are responsible for obtaining, in advance of any research activity on foreign soil, all special visas and/or permits and licenses that may be required and are encouraged to contact the local United States embassy for assistance if any concerns arise during the trip. Travelers are required to comply with applicable laws and regulations imposed by or relevant in the destination country(s). The laws and regulations of the destination country of travel may also require a traveler to obtain an export license from such country prior to the departure from that country depending upon activities such as the taking of technical and/or scientific data and information in a storage medium upon the departure from such country. Failure to comply with the laws and regulations of a foreign country may result in arrest, jail, and prosecution by foreign governments. Special attention should also be paid to situations where travelers are passing through an intervening country on their return to the United States. Such travel may also impose legal requirements upon the departure from the intervening country. The University may have limited ability to intervene or assist in the event of arrest abroad, and University costs incurred for legal counsel, fines, etc., will be the responsibility of the traveler's home department. Travelers are encouraged to consult the University's Director of Export Compliance in advance of travel in the event their activities while travelling

to foreign countries will involve the collection or dissemination of technical and/or scientific data and information.

(b) **Policy Noncompliance:** Failure to submit required international travel information and obtain applicable reviews, approvals, permits, and licenses in advance of the trip may result in having the trip designated as unauthorized, which may result in disciplinary action, non-reimbursement of travel expenses, ineligibility for University insurance during the trip, and limitations on future travel. Noncompliance with U.S. and foreign regulations may also result in severe penalties, including criminal prosecution, attorneys' fees, personal fines, and jail.

#### 4.4 Laptop Computers and Other Equipment

(a) For all destinations outside the United States, software; information (intellectual property, data, technology, schematics, etc.); equipment (including laptops, cell phones, etc.); or service (including gratis conference presentations) must be vetted prior to travel for possible export control issues. Generally, laptops and other devices that contain only Operating Software, Web Browsers, and Software such as Microsoft Office and Adobe have no export control license restrictions unless travel is to a restricted/embargoed country. Special attention should be paid as to the existence of any technical and/or scientific data and information that is contained in any storage medium taken outside the United States, which in such instance may require an export license if such data or technical information is controlled for export. If there are any questions regarding whether any such technical and/or scientific data and information is controlled for export, and therefore may require an export license, the University's Director of Export Compliance should be consulted.

i. See the University's Export Compliance [website](#) for guidance and/or contact the University's Director of Export Compliance for guidance well in advance of committing to the trip. A federally issued export license or documented license exception may be needed prior to travel outside the United States, depending on the proposed destination, the equipment or materials to be taken to or from the foreign location, the nature of the project or activity associated with the travel, and individuals and organizations to be contacted. This requirement applies whether or not an individual is working on an export-controlled project.

(b) **Travel to Sanctioned or Embargoed Countries:** Certain countries, such as Iran, Cuba, Syria, Libya, Sudan, and North Korea, are sanctioned or embargoed. The Export Compliance Office maintains an up-to-date list of the sanctioned/embargoed countries. All University employees, regardless of the nature of the proposed professional activities and possible professional contacts in these countries, must coordinate proposed travel to any restricted/embargoed country through the Center for Global Engagement, the Director of Global Safety and Security, and the Export Compliance Office, and must be licensed by the appropriate government agency in advance of Travel Authorization.

i. **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.