HIGH RISK TRAVEL TO RESTRICTED REGIONS AND FOREIGN ADVERSARIES

Scope: Louisiana State University

Effective: July 1, 2024

Purpose: To identify and mitigate the risk associated with high-risk travel to Restricted Regions and Foreign Adversaries.

Louisiana State University supports and encourages international travel and collaborations and recognizes that a global perspective is essential to its academic mission. The University is equally committed to the safety and well-being of its students, faculty and staff when they participate in these activities and realizes that some areas of the world present heightened health, safety and security risks. Countries/regions that have U.S. Department of State Travel Advisories and/or countries identified as foreign adversaries require special efforts to mitigate risk and, when necessary, call for the avoidance of travel altogether.

The University requires all travel to countries with U.S. Department of State Travel Advisories, including those identified as foreign adversary countries as defined in this policy, to be approved by the Executive Vice President and Provost or his/her designee at the recommendation of the International Travel Oversight Committee (ITOC).

Definitions:

A. International Travel Oversight Committee (ITOC) – Committee led by the Senior Vice Provost for Academic Affairs that includes representatives from across campus, including two faculty members recommended by the Faculty Senate President, two staff members recommended by the Office of Academic Affairs, two staff members recommended by the Associate Vice President of Accounting Services, and one staff member specialized in international travel and risk management recommended by the Office of Risk Management.

B. U.S. Department of State Travel Advisories – Advisory levels provided to inform travelers of country-specific safety information and risks of international travel. The U.S. Department of State Travel Advisories can be found at http://www.travel.state.gov/. The Advisory levels are defined as follows:

1. **Level 1 – Exercise Normal Precautions:** This is the lowest advisory level for safety and security risk. There is some risk in international travel. Conditions in other countries may differ from those in the United States and may change at any time.

2. **Level 2 – Exercise Increased Caution:** Be aware of heightened risks to safety and security. The U.S. Department of State provides additional advice for travelers in these areas in the Travel Advisory. Conditions in a country may change at any time.

3. **Level 3 – Reconsider Travel:** Avoid travel due to serious risks to safety and security. The U.S. Department of State provides additional advice for travelers in these areas in the Travel Advisory. Conditions in a country may change at any time.

4. **Level 4 – Do Not Travel:** This is the highest advisory level due to the greater likelihood of life-threatening risks. During an emergency, the U.S. government may have very limited ability to provide assistance. The U.S. Department of State advises that U.S. citizens not travel to the country or to leave as soon as it is safe to do so. The U.S. Department of State provides additional advice for travelers in these areas in the Travel Advisory. Conditions in a country may change at any time.

Note: Some countries have more specific advisory information for regions within the country. Travelers are encouraged to read the country's Advisory in its entirety when determining the travel risk.

C. Foreign Adversary Countries – 15 CFR §791.4 Determination of Foreign Adversaries (https://www.ecfr.gov/current/title-15/subtitle-B/chapter-VII/subchapter-E/part-791/subpart-A/section-791.4) identifies the foreign adversary countries.

D. Restricted Regions – Includes countries or regions of a country with a Level 3 or Level 4 Travel Advisory issued by the U.S. Department of State (http://www.travel.state.gov/).

Procedures:

A. This policy applies to the following:

1. LSU faculty and staff traveling internationally with or without university and/or affiliate funding, to conduct University business within one's capacity, such as participation in research, conferences, teaching endeavors or technical assistance activities.

2. LSU graduate and undergraduate students, traveling internationally as individuals or in groups, with or without university and/or affiliate funding, for any LSU-sponsored, LSU-administered, or LSU-related activity/program (including, but not limited to activities such as taking part in official study abroad programs, participating in recognized student organization trips abroad, conducting research, attending conferences or technical assistance activities).

B. International Travel to Restricted Regions

Travel to Restricted Regions will be limited by the University due to the acute risks associated with health, safety, and security. Travel requests to Restricted Regions must be approved by the Executive Vice President and Provost or his/her designee at the recommendation of the ITOC. Each traveler must complete the appropriate approval process listed in Section C and will be expected to:

1. Provide a compelling justification as to why the travel is required and how it fulfills the critical mission of the University. The justification should include why no reasonable alternative travel location is available.

2. Address mitigation for major health, safety, and/or security concerns.

3. Provide a detailed itinerary.

4. Contact the University Travel Assistance Provider for them to conduct a risk review per trip and travel location. The Provider's contact information is listed on the LSU Office of Risk Management website at https://lsu.edu/riskmgt/travel/international-travel-insurance.php.

No student, faculty or staff can be required to travel to a Restricted Region.

C. Approval Process to Travel to Restricted Regions and Foreign Adversaries

Request for travel to Restricted Regions should be submitted **30 days in advance** of the proposed departure date or as soon as the trip is known. Late requests cannot be guaranteed a decision prior to the proposed departure date and may result in a denied application and/or delayed start date for travel. The University reserves the right to withhold reimbursement and/or take other disciplinary actions for unauthorized travel.

1. The following documentation is required by the individual or program to travel to a Restricted Region for approval by the Executive Vice President and Provost or his/her designee at the recommendation of the ITOC.

    a. AS295 "Request to Travel to Restricted Region and Foreign Adversaries for Individual Travelers" or AS296 "Request to Travel to Restricted Regions and Foreign Adversaries for Student Study Trips".

    Note: The form must be completed in its entirety and signed by the Dean/Director or Department Head/Chair prior to submission for approval.

    b. AS297 "Faculty/Staff Emergency Contact Form".

    c. AS298 "High Risk Travel Release and Waiver" is required in the event that the high-risk travel request is not approved, and the traveler chooses to proceed with the travel. The form must be signed by each traveler. The form should be notarized with two witnesses to acknowledge the release.

    d. Upon approval approved by the Executive Vice President and Provost or his/her designee at the recommendation of the ITOC, the AS295 or AS296 will be returned to the traveler.

2. Upon approval for travel to a Restricted Region, the traveler must register to be covered by the University's international travel insurance and should register with the U.S. Embassy/Consulate of the country of travel.

    a. If travel is booked through the university contracted travel agency, the trip will be automatically registered with the University's Travel Assistance Provider.

    b. If travel is booked outside of the university contracted travel agency, the registration must occur through one of the methods detailed on the LSU Office of Risk Management website.

To access the website and registration information, to https://lsu.edu/riskmgt/travel/international-travel-insurance.php.

c. To register travel with the U.S. Embassy travelers should go to https://step.state.gov/step/.

D. Faculty Regional Experts

A separate approval process is in place for faculty who are experts in a geographic region that is in a Restricted Region and must travel there to conduct research. The faculty member must submit the following information:

1. A signed letter of support from the Dean/Director and Department Head/Chair stating that the faculty is an expert in the specified geographic region and travel is necessary for him/her to carry out research.

2. A signed letter from the faculty member explaining that he/she has expert knowledge of the region, is aware of the risks, and is adequately prepared to mitigate them.

The ITOC will review both documents and make a recommendation to the Executive Vice President and Provost or his/her designee. If approved, the faculty member will be allowed to travel for one calendar year from the date of approval. For each individual trip to the Restricted Region, the faculty member will be required to complete all forms and submit documents as required in Section C of this policy. The University retains the right to withdraw this approval and/or require the faculty to return to the United States.

E. Faculty Field Experts

A separate approval process is in place for faculty whose research specialty requires them to travel to high-risk locations in Restricted Regions. The faculty may not necessarily be experts in the geographic region. The faculty member must submit the following information:

1. A signed letter of support from the Dean/Director and Department Head/Chair stating that the traveler is prepared to mitigate the risks involved with travel to the Restricted Region and frequent and/or last-minute travel is necessary for them to carry out their specific job functions.

2. A signed letter from the faculty member explaining the critical nature of their work in the region, that they are aware of the risks, and are adequately prepared to mitigate them (including evidence of expertise in the region of travel or risk training related to his/her activities in the region).

For each individual trip to a Restricted Region, the faculty member will be required to complete all forms and submit documents as required in Section C of this policy. The University retains the right to withdraw approval and/or require the faculty to return to the US.

F. Travel to Foreign Adversary Countries

Pursuant to Act No. 106: https://legis.la.gov/legis/ViewDocument.aspx?d=1331776, travel to a foreign adversary country is subject to pre-approval and screening by the university for any

employment-related foreign travel to foreign adversary countries and employment-related foreign activities engaged in by any faculty member, researcher, or any other research department staff with foreign adversaries.

Pre-approval shall be in accordance with the Procedures of this policy based on the binding commitment of the individual traveler not to violate the university's limitations on travel and activities abroad and to obey all applicable federal laws. Any person subject to this Section traveling abroad representing the university, upon return, shall report any gifts of funds or promises to pay offered by a foreign adversary or any entity representing the interests of a foreign adversary.

The university shall maintain records of all employment-related foreign travel requests and approvals to foreign adversary countries; expenses reimbursed by the institution or affiliate organization of the institution during travel, including for transportation, food, and lodging; and payments and honoraria received during the travel and activities, including for transportation, food, and lodging.

The university shall keep records of the purpose of the travel and any records related to the foreign activity review. These records shall be retained for at least three years, or any longer period of time required by any other applicable state or federal law.

The university shall provide an annual report of travel to foreign adversary countries listing individual travelers, foreign locations visited, and foreign institutions visited to the Board of Supervisors.

G. Cancellation of Approval

The University reserves the right to cancel any approved travel prior to departure to the Restricted Region, including to the foreign adversary country, if the level of risk increases, or for any reason, at the University's discretion.

H. Travel Evacuation or Advisory Issued During Travel Status

If a traveler is in a Restricted Region, including to a foreign adversary country and a security evacuation is issued, the traveler must accept evacuation assistance and return to the U.S. or move to a safe location immediately. If a travel advisory is issued, the traveler may be requested to return to the U.S. or move to a safe location.

I. Penalties for Violations

The University will not support or approve travel to Restricted Regions, including to foreign adversary countries, that takes place without adhering to the requirements of the University's travel policy.

The University reserves the right to withhold reimbursement and/or take other disciplinary actions for unauthorized travel to Restricted Regions, including to foreign adversary countries.

J. Planning Resources

The LSU Office of Risk Management can assist in planning international travel through the pre-departure resources available via the LSU Office of Risk Management International Travel Insurance website at https://lsu.edu/riskmgt/travel/international-travel-insurance.php.

1. Custom over the phone and e-mail security and medical briefings for each trip/location,
2. Custom lodging and transportation recommendations based on the traveler's itinerary,
3. Identification of recommended medical facilities,
4. Recommended vaccinations,
5. Discussion of other important cultural or travel considerations,
6. Policy and coverage services information,
7. Downloadable brochure with insurance card,
8. Claims forms,
9. Mobile application installation guides for Android and iPhone.