

Northwestern

OFFICE OF GLOBAL SAFETY AND SECURITY

POLICY ON UNDERGRADUATE INTERNATIONAL TRAVEL

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Policy Statement

This policy governs University-sponsored undergraduate international activities. It requires review and approval of undergraduate travel to Level 3 countries and generally prohibits travel to Level 4 or CDC Warning countries, as explained below. The University reserves the right to require Directed Review of international activities where additional scrutiny seems prudent and to withdraw its approval at any time should conditions in a request for approval change materially. For purposes of this policy, the terms international activities, Level 3 country, Level 4 country, CDC Warning country, and Directed Review have the specialized meanings defined below.

The International Travel Risk Assessment Committee (“ITRAC”) administers this policy under the direction of its chair, the Director of the Office of Global Safety and Security (“OGSS”). For more information about ITRAC’s members and mission, visit the [ITRAC page](#).

Purpose

To minimize health and safety risks, Northwestern has developed policies and procedures to govern undergraduate travel for international opportunities and experiences.

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

Definitions

CDC Warning country: a country designated by the U.S. Centers for Disease Control and Prevention (“CDC”) as a [Warning Level 3](#) county, or a country at high risk to travelers (Avoid all nonessential travel/Red).

Directed Review: the requirement that an undergraduate group, program or individual complete the Travel Permission Request process at the request of an authorized individual in cases where an additional level of scrutiny seems prudent. Individuals authorized to request Directed Review include the Director of OGSS, the Chair of the Undergraduate Study Abroad Committee, the Associate Provost for Undergraduate Education, or the Assistant Vice President for Risk Management. OGSS staff, in consultation with the Office of Risk Management and the Office of the General Counsel, will decide which level of review is required (expedited or regular).

International activities: include, but are not limited to, Northwestern affiliated, approved unaffiliated and approved Non-Northwestern undergraduate study abroad programs; internships; field studies; service learning; research; athletic competitions; arts performances or exhibitions; and volunteer, experiential, or work programs sponsored, endorsed, or administered by the University. (Criteria for determining whether non-credit undergraduate travel is University sponsored is available [here](#).)

Level 1 country: a country determined by U.S. DOS to be at the lowest advisory level for safety and security risk ([Exercise Normal Precautions](#)/Blue).

Level 2 country: a country determined by U.S. DOS to pose heightened risks to safety and security ([Exercise Increased Caution](#)/Yellow).

Level 3 country: a country determined by U.S. DOS to pose serious risks to safety and security ([Reconsider Travel](#)/Orange).

Level 4 country: a country determined by U.S. DOS to be at the highest advisory level due to greater likelihood of life-threatening risks ([Do Not Travel](#)/Red).

Travel Permission Request: the process outlined in this policy for requesting review and approval to engage in University-sponsored undergraduate international activities.

Policy Implementation

I. *Authorization of undergraduate travel*

A. Level 1 or 2 Countries

Undergraduate travel to countries with an overall U.S. DOS [Travel Advisory of Level 1 or 2](#) do not require additional review or authorization, although standard pre-departure requirements apply.

B. Level 3 Countries

Undergraduate travel to countries with an overall U.S. DOS [Travel Advisory of Level 3](#) (“Level 3”) requires review by the ITRAC and approval by the Associate Provost for Global Affairs (“APGA”), or her designee. Units sponsoring group travel must obtain permission on behalf of its travelers. Additional pre-departure requirements apply. Programs that meet certain requirements may qualify for an expedited review by the OGSS. A truncated renewal process will also be made available for reoccurring trips/programs.

C. Level 4 Countries

Undergraduate travel countries with an overall U.S. DOS [Travel Advisory of Level 4](#) (“Level 4”) or a Centers for Disease Control and Prevention Travel Health Notice [Warning Level 3: Avoid Nonessential Travel](#) (“CDC Warning”) is prohibited. Accordingly, the University will not grant academic credit or provide funds for any such activities. However, exceptions may be made in certain circumstances when the student’s experience is facilitated, sponsored, monitored or controlled by Northwestern faculty or staff. Additional pre-departure requirements also apply. Potential applicants must obtain permission from the OGSS before seeking review by the ITRAC and approval by the APGA, or her designee.

D. Exemption

Northwestern undergraduates (F-1 or J-1 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 OGSS at least six weeks prior to departure. Such students are still required to complete the standard pre-departure requirements.

E. Grandfather Clause

Northwestern-affiliated study abroad programs and recurring non-credit student trips located in Level 3 countries that were reviewed and approved prior to January 10, 2018 are exempt from this process having already been reviewed under prior policy directives. There are no study abroad programs or recurring non-credit student trips located in Level 4 countries. Finally, as of January 10, 2018, there were no countries under a CDC Warning, which is a rare designation.

II. *Travel Permission Request process*

A. Timing

The Travel Permission Request process for undergraduate participation in international activities in Level 3 or Level 4 countries (or under a CDC Warning) must commence at least one quarter prior to planned departure (See Travel Permission Requests, “TPR”).

Opportunities to participate in Northwestern-managed group travel experiences, including new study abroad programs, may not be formally marketed until Travel Permission is granted by the APGA or her designee.

B. Responsible requesting unit or individual

The sponsoring administrative unit, program director or faculty/staff trip leader is responsible for requesting Travel Permission for Northwestern-sponsored non-credit group travel or new/existing study abroad programs/affiliations.

The student trip leader is responsible for requesting Travel Permission for Northwestern-sponsored non-credit group travel that is not accompanied by a faculty or staff member (typically a Registered Student Organization).

An individual traveler is responsible for requesting Travel Permission and must work with a faculty or staff sponsor on their request.

C. Instructions for making Travel Permission Requests

Requests for Travel Permission to engage in undergraduate international activities in locations subject to a Level 3 or Level 4 advisory (or under a CDC Warning) are made to the ITRAC. Requests for permission to create a new Northwestern-affiliation should follow the guidelines for [Group Travel](#). Requests for permission for individual student international activity should follow [Individual Travel](#) Request.

All Travel Permission Request materials must be submitted at least one quarter prior to the envisioned start of the experience to the Committee chair. The Committee will not review requests until all relevant materials have been submitted. Due to the limited number of times the ITRAC meets each year and the complexity involved in making a quality Travel Permission Request, applicants should plan on the entire review process taking six to eight weeks. Failure to allow sufficient time for review may result in a denied request and/or a delayed program start. Travel Permission only applies to the specific program or experience approved, not to a country or region.

In cases where a new Level 3 or Level 4 advisory (or a new CDC Warning) is issued less than one quarter prior to an already approved program's student request deadline, every effort will be made to facilitate an emergency meeting of the Committee to conduct a thorough and timely review of the situation.

Note: the Committee reserves the right to adjust these procedures without notice.

D. Expedited review

Undergraduate travel to countries with a Level 3 advisory may be subject to an expedited review conducted by the Office of Global Safety and Security, so long as the experience meets at least two of the following criteria:

- the itinerary or travel purpose involves low risk or routine activity;
- the destination is well-known to Northwestern (i.e., it has been previously reviewed by ITRAC, is frequently traveled to by students or is host to at least one study abroad program);
- the travel is related to a previously-approved location to continue a project or activity;

- the experience includes a high degree of on-site support; or
- the request is a renewal of prior approval (unless a change of condition has occurred, such as the elevation from a Level 3 to a Level 4 advisory).

Experiences that do not meet the above criteria must be reviewed by the ITRAC and approved by the APGA, or her designee.

ITRAC members and the APGA will receive quarterly reports from the OGSS summarizing expedited reviews.

E. Directed review

When significant travel health or safety concerns exist about a proposed international experience, but the destination is not under a Level 3 or Level 4 advisory, authorized individuals may require the submission of a Travel Permission Request. Circumstances that might prompt a Directed Review include:

- Level 2 destinations that are new to Northwestern;
- groups or individuals inexperienced in travel;
- group or individuals proposing sustained activities located in internal areas of heightened risk (Level 3) within a country with an overall rating of Level 1 or 2;
- activities involving higher-risk or a specialized set of skills or training (such as construction, open water, medical services, etc.);
- countries recently downgraded from a Level 4 to Level 3;
- countries recently downgraded from a CDC Warning to a CDC Alert; or
- other issues of concern not addressed in the aforementioned list.

The Director of the Office of Global Safety and Security, in consultation with the Associate Provost for Undergraduate Education, the Chair of USAC or the Assistant Vice President of Risk Management, will determine whether or not the activity requires Directed Review.

F. Review and approval

Requests for Travel Permission are reviewed by the ITRAC. Approval decisions are made by the APGA after review and recommendation by the ITRAC.

1. *Approval criteria*

The request must be strongly linked to relevant and meaningful academic or experiential goals. Foreseeable health or safety concerns raised in the request must be adequately addressed. The ITRAC will only recommend approval of requests when there is a compelling justification for the program.

In addition to the materials provided by the applicant, the Committee may also take into account in its discretion:

- relationships with partner institutions abroad;

- consultations with on-site individuals, such as alumni, students and staff and faculty of other programs as well as the nearest U.S. embassy or consulate;
- consultations with representatives from government agencies such as the U.S. DOS, the Overseas Security Advisory Council (OSAC), the Centers for Disease Control and Prevention (CDC) and the World Health Organization (WHO);
- assessments of other foreign governments, such as Australia, Canada, Ireland, New Zealand and the United Kingdom;
- policies and decisions of other universities and colleges;
- travel warnings or advisories issued by other countries; and
- other relevant material or advice.

2. *ITRAC approval recommendations*

After reviewing the request materials and conducting its review, the ITRAC, by majority vote, could make one of several forms of approval recommendations to the APGA:

1. Approve participation at the location for a one-time specific education abroad program opportunity only.
2. Approve participation at the location for a specific student for a one-time specific project or program.
3. Approve operation of an affiliated, USAC-approved study abroad program. Such approval would be granted for three years, absent any material change in the Travel Advisory or CDC Warning. At least one quarter prior to the approval's expiration, a representative from the sponsoring academic unit may request continuation.
4. Conditionally approve in one of the three above categories, with recommendations for programmatic changes. (As soon as the Chair receives written communication affirming the completed changes, the recommendation to approve will pass from the Committee to the APGA, or her designee.)

The APGA, or her designee, will review the Committee's recommendations to make a final determination, or, in rare incidents, request additional information or clarification from the Committee or from the Travel Permission applicant.

3. *ITRAC denial recommendations*

After reviewing the request materials and conducting its review, the ITRAC, by majority vote, could recommend that the APGA deny Travel Permission. In cases of a denied recommendation, the ITRAC will share its written recommendation and rationale with both the travel permission applicant and the APGA. The travel permission applicant will then have 10 days from the receipt of the ITRAC denied recommendation to submit additional written materials in support of the request to the APGA, should the applicant choose to do so. The APGA, or her designee, may also request additional information or clarification from the Committee or from the applicant.

The APGA, or her designee, will generally accept the denial recommendation of ITRAC unless the applicant can demonstrate that:

1. There was a procedural error in the initial recommendation (i.e. failure to meet quorum, incomplete review packet, etc.);
2. There is new information that was not available at the time of the initial review; or

3. The recommendation to deny permission was grossly unfair or manifestly contrary to the weight of the record.

The APGA, or her designee, will review all information to make a final determination. In all cases, this decision is final and not subject to appeal.

III. *Credit-bearing undergraduate study abroad program requirements*

A. New study abroad programs

Newly proposed study abroad programs in countries with a Level 3 or Level 4 advisory (or a CDC Warning) must apply for Travel Permission (unless they fall under the Grandfather Clause). OGSS staff, in consultation with the Office of Risk Management and the Office of the General Counsel will decide which level of review is required (expedited or regular). Sponsors of new study abroad proposals for programs located in such countries are encouraged to work on the USAC and ITRAC requests concurrently. However, new proposals have to clear USAC before being forwarded to the IRAC for review and recommendation to the APGA.

However, given the types of destinations assigned Level 4 advisories, it is highly unlikely that any of those countries have sustained educational facilities or resources of comparable quality to Northwestern, and would not meet the USAC threshold for approval.

Note: as OGSS's Assistant Director is an ex-official member of USAC, new study abroad programs in countries with a Level 1 or Level 2 advisory will also be reviewed per USAC procedures.

B. Unaffiliated study abroad program participation in countries with Level 3 or Level 4 advisories (or a CDC Warning)

Assuming a student intends to obtain credit for his/her experience in an unaffiliated program, the student must first meet with a staff member from Undergraduate Learning Abroad ("ULA") to ensure the activity meets Northwestern standards of academic integrity. Students should follow the guidelines associated with their proposed term of study: [unaffiliated academic year](#) or [unaffiliated summer](#). ULA will work with OGSS to direct a student whose program is located in a country with Level 3 to the next appropriate next step of the Travel Permission Request process.

Again, given the types of destinations assigned Level 4 advisories, it is highly unlikely that any of those countries have sustained educational facilities or resources of comparable quality to Northwestern, and would not be granted transfer credit.

IV. *Pre-departure requirements*

In addition to completing the standard pre-departure requirements, all students participating in international experiences in countries under a Level 3 or Level 4 advisory (or CDC Warning) that operate with Travel Permission are required to submit a signed special release a least four weeks prior to departure. This requirement is administered through Canvas.

Faculty or staff accompanying students abroad are required to participate in Trip Leader Training prior to departure. For annual reoccurring trips, a leader must attend training at least every other year. Leaders will be notified by OGSS staff of the training opportunities offered each quarter. Employees are also required to register with GeoBlue prior to departure and submit a complete program itinerary to OGSS or ULA.

V. *Revocation of Travel Permission*

Northwestern University reserves the right to withdraw its approval at any time should conditions presented in a request for approval change materially. The OGSS, 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 OGSS will direct communications to sponsors and travelers when there is a change of condition that might prompt heightened awareness or travel modifications, including evacuation.

VI. *Suspension or modification of programs or activities*

In addition to reviewing requests for Travel Permission under the Undergraduate Travel Policy, ITRAC is also responsible for recommending whether or not to suspend or modify an ongoing or previously approved education abroad opportunity if a significant health, safety or security concern is raised regarding that experience. In making this assessment, the Committee will consider the risk management plan for the students, staff or faculty involved in the program or experience and the balance between the value of the experience in that specific location versus the risks associated with that location/activity.

Though uncommon, it is possible that a specific program, activities in a specific location (city, region, or country) or all activities abroad would need to be modified or suspended by the University due to a health or safety concern. This concern may arise if a new/revised Travel Advisory or CDC Warning is issued for the destination or if other conditions presented in a Travel Permission or Review Request change materially.

See [Travel Modification or Suspension](#) and [Evacuation](#) for more information.

VII. *Travel Permission renewals*

Absent a change of condition that warrants earlier evacuation, recurring programs or experiences that operate with Travel Permission under the policy are valid for three years from the first cohort's departure. Upon expiration, the program's administrative sponsor (or the individual's faculty/staff sponsor) must submit a renewal request under the Travel Review process. The OGSS and the sponsoring unit are responsible for monitoring health and safety conditions as well as obligated to notify the Committee if conditions change materially in the three-year period between authorization and re-review. OGSS staff, in consultation with the Office of Risk Management and the Office of the General Counsel will decide which level of review is required (expedited or regular).

The OGSS will maintain Travel Permission requests records and periodically contact the program's administrative sponsor (or the individual's faculty/staff sponsor) for updated documentation for reoccurring international activities.

VIII. *Additions or modifications to approved trips or programs*

If an approved international program or experience adds a new activity or academic track that materially changes its security profile, an explanation of how perceived risks may be mitigated may be required. The applicant should consult with the OGSS to determine what parts of the [Group Travel or Individual Travel application](#) are required for OGSS or ITRAC review.

IX. *Financial responsibility*

Northwestern University does not assume responsibility for financial risks associated with participation in its education abroad opportunities. If the University cancels a program before departure or while the program is in progress for reasons beyond its control including, but not limited to, political unrest or danger to participant safety, changes to the U.S. DOS Travel Advisory or the CDC Warning, only those recoverable fees or tuition refunded to the University by service providers and/or institutions will be returned to participants. The University will make reasonable efforts to obtain refunds from applicable service providers and/or institutions, but no refunds are guaranteed. In addition to lost fees and tuition, participants may incur additional travel expenses in connection with program cancellation. Participants may or may not receive academic credit if a program is canceled. The University assumes no responsibility for the financial or other losses of program participants resulting from cancellation.

X. *Supplemental insurance*

Students, staff, and faculty are encouraged to consider supplemental insurance options to cover losses if programs or activities are canceled. Supplemental insurance is also helpful if a traveler needs to cancel participation in a program or return early due to unforeseen personal emergencies. Such insurance is not required by the University and must be purchased on an individual basis.

Consequences of Violating this Policy

Individual undergraduates who have not obtained Travel Permission (or whose travel program administrators have not obtained Travel Permission) will not receive academic credit or institutional funds for related international travel activities in locations under Level 3 or Level 4 advisories (or a CDC Warning).

Employees who knowingly facilitate undisclosed and unapproved or non-reviewed University-sponsored undergraduate international travel may be subject to discipline under University policies and procedures, including termination of employment.

Links to Related Information

Northwestern resources

[GeoBlue for students](#)

[ITRAC page](#)

[OGSS evacuation information](#)

[OGSS travel modification or suspension information](#)

[Student Handbook](#)

[OGSS releases for undergraduate travel to Level 3 and Level 4 countries](#) (scroll down to end of page)

U.S. government resources

[Centers for Disease Controls and Prevention Travelers Health](#)

[U.S. Department of State / Bureau of Consular Affairs](#)

Contacts

The following individuals or offices can address questions regarding this Policy:

1. For questions about Travel Permission applications, criteria or pre-departure requirements: Program Coordinator, Beth Osterlund, at (847) 467-3899 or beth.osterlund@northwestern.edu
2. For questions about specific security risks in proposed destinations: Assistant Director, Jonathon Zinger, at (847) 467-7902 or Jonathon.zinger@northwestern.edu
3. For questions regarding evacuation or other emergency travel services: Director, Julie Anne Friend, at (847) 467-3175 or Julie.friend@northwestern.edu

History

Revised policy effective March 2018. Original policy was adopted in September 2012 and revised in 2015, 2016, and 2017.