



## **POLICY ON INTERNATIONAL TRAVEL**

### **Purpose**

Tufts University is committed to the health, safety and security of all members of the university community. As a global institution, Tufts University supports and encourages University International Travel by its faculty, staff, and students for purposes intended to advance the mission of the University.

The purpose of this policy is to specify the practices and processes required when traveling internationally. The policy requirements are intended to manage the risks associated with international travel, as well as meet obligations set forth in applicable laws.

### **Scope**

This policy applies to all University International Travel undertaken by faculty, staff, or students.

This policy does NOT cover or provide authorization for funding of any University International Travel. In addition to the requirements in this policy, Travelers must ensure they have met all applicable requirements of the [Tufts Travel Policy](#), the Business Expense Policy, any additional approval requirements imposed by their Unit, and the requirements for funding of their travel, including requirements from extramural sponsors.

### **Definitions**

#### **High-Risk Destinations:**

- are labeled by the U.S. Department of State as Travel Advisory Level 3, Travel Advisory Level 4, include the caveat “Reconsider Travel” or “Do Not Travel” within the applicable travel advisory, or are Sanctioned Countries and Entities, as defined in this Policy.

#### **High-Risk Activities:**

- pose health, safety or security concerns, as determined by the University.

The University reserves the right, in its sole discretion, to designate other locations and activities as High-Risk.

**International Travel Review Committee:** The International Travel Review Committee (“Committee” or “ITRC”) reviews all proposed students’ University International Travel and evaluates the safety and security risks associated with the travel.

**Sanctioned Countries and Entities:** Refers to countries and entities that are listed as a “Foreign Country of Concern” in the CHIPS Act or are subject to United States trade or economic restrictions, as specified by the U.S. Department of Treasury’s Office of Foreign Assets Control sanctions, the U.S. Department of Commerce’s Lists of Parties of Concern, and the U.S. Department of State’s International Traffic in Arms Regulations.



**Travel Registry:** The secure database Travelers use to register their University International Travel and trip details. This may include, but is not limited to, information such as trip dates, destination, emergency contact information, itinerary, and sponsoring department.

**Unit:** Department, institute, program, organization, or school at Tufts facilitating or funding University International Travel.

**University International Travel:**

Regardless of funding source, any travel by a Traveler to an international location for educational, research, or business purposes related to the Traveler's affiliation with, or role at, Tufts University. This includes travel to an international location that is organized by any Tufts University organization, division, department, or office. Personal travel is not considered University International Travel, even if the Traveler performs *de minimis* educational, research, or business activities on the trip.

**University International Travelers (or Travelers):** Refers to Tufts students, faculty or staff on University International Travel.

## **Policy Statement**

Prior to travel, all University International Travel is subject to review by Tufts Global Operations and the Office of the Vice Provost for Research ("OVPR"), as specified below.

### Use of the Travel Registry

To effectively promote the safety and security of University International Travelers, all individuals participating in University International Travel must register in the Travel Registry at least 60 days prior to departure or as soon as possible if the decision to travel is made less than 60 days prior to departure. Note that there may be situations where 60 days is not adequate to allow University review (e.g., travel that will require an export control license). As such, please register University International Travel as early as possible.

Registration in the Travel Registry allows the University to provide information and assistance before, during, or after travel in response to events that might present health and safety risks to Travelers, such as natural disasters, disease outbreaks, terrorism or civil unrest; and proactively provide information regarding cybersecurity and export control compliance risks.

### Travel Record

Registration through the Travel Registry is required for all University International Travel. Depending on the travel location and purpose, the OVPR may provide a research security briefing to the Traveler, which may include requirements or recommendations related to modifying the travel itinerary, utilizing a loaner laptop (contact Tufts Technology Services for additional



information), or taking other precautions to reduce security risks. For travel to Sanctioned Countries and Entities, the University may be required to procure a government license or authorization in advance of the planned travel. All Travelers are, at a minimum, obligated to comply with U.S. Export Control regulations, other applicable laws and regulations, and the Tufts Export Control Policy while on University International Travel.

In addition, student University International Travel involving High-Risk Destinations or Activities requires review and approval prior to travel by the ITRC. For additional information related to the ITRC review process and high-risk travel please see: [Link to Tufts Global Procedures for Travel Registration]

### Export Control and University International Travel

For the purposes of export control regulations, when traveling outside of the U.S., University International Travelers are considered exporters of any tangible items and technical information they take with them or share abroad. This includes common electronic devices (e.g., laptops, tablets, cell phones), as well as the data on the devices and the underlying technology and encryption software. Depending on the items being transported and the countries being visited, an export license from the U.S. government may be required prior to departure. The Export Control Officer within OVPR will prepare and submit the application for export licenses but note that the U.S. government review often takes several weeks or months to process.

For additional information and guidance on export controls, please refer to the Policy on Export Controls, the Tufts Export Control [website](#), and/or contact the Export Control Officer at [exportcontrol@tufts.edu](mailto:exportcontrol@tufts.edu).

### **Consequences for Violating this Policy**

If any Traveler fails to register in the Travel Registry despite being required to do so under this Policy, they are subject to consequences which may include but are not limited to:

For faculty/staff:

- The non-reimbursement of expenses from the University International Travel
- Potential forfeiture of federal funding of their project
- Revocation of their eligibility to be a Principal Investigator

For Students:

- Loss or failure to earn academic credit related to their travel
- Loss of funding for the University International Travel



Furthermore, any failure to comply with applicable U.S. Export Control regulations and other applicable laws and regulations while on University International Travel may result in criminal and civil prosecution and fines. In addition, a University International Traveler who does not register their University International Travel in the Travel Registry will not have their information directly forwarded to Tufts' global assistance provider, which could delay assistance services.

**Approval Entities**

Office of the Vice Provost for Research  
Tufts Global Operations

**Approval Date**

**Effective Date**

July 1, 2025

**Last Updated**

April 17, 2025

**Executive Sponsor**

James Hurley, Vice President for Finance & Treasurer  
Bernard Pragash Arulanandam, Vice Provost for Research

**Policy Owner**

Elisabeth Keegan, Director of Global Operations  
Theodore Alan Myatt, Associate Vice Provost for Research

**Revision**

The University reserves the right to change this policy from time to time. Proposed changes will normally be developed by the policy managers with appropriate stakeholders. The review entities have sole authority to approve material changes to this policy. Modifications to this policy that are not material may be approved by the Office of University Counsel.

**Review Cycle**

TBD

**Related Policies**

Policy on Export Control Compliance  
Anti-Corruption Policy  
Anti-Trafficking Policy

**Catalogue Number**

TBD