

INTERNATIONAL TRAVEL GUIDANCE

USC encourages its faculty, staff, and students to participate in university-related international activities, including international study and research. USC also has several international offices that support the university's efforts in global recruiting, partnerships with foreign universities, governments, and other institutions, and exchange opportunities.

That said, travel outside the United States can also present a range of legal and safety issues for faculty, staff, and students under United States law and university policy.

Where are you going?

Although international travel does not necessarily raise special concerns simply because of the country you are traveling to, the US State Department issues periodic "Travel Warnings" when long-term, protracted conditions make a country dangerous or unstable. A Travel Warning is also issued when the U.S. Government's ability to assist American citizens is constrained due to the closure of an embassy or consulate, or because of a drawdown of its staff. For a list of current Travel Warnings, please visit the State Department's web-site at http://travel.state.gov/travel/cis_pa_tw/tw/tw_1764.html.

Also, under federal regulations administered by the Office of Foreign Assets Controls (OFAC) in the Department of Treasury, the United States imposes economic and trade sanctions against targeted foreign countries and regimes for reasons of national security and foreign policy. Where it has imposed comprehensive sanctions on a country, all travel is prohibited. Even if sanctions are limited, travel restrictions are likely to be significant. Examples of countries subject to OFAC sanctions include North Korea, Cuba, Syria, Iran, Iraq, and Liberia. Because the list of sanctioned countries is subject to change at any time, please visit the OFAC website at <http://www.treasury.gov/RESOURCE-CENTER/SANCTIONS/Programs/Pages/Programs.aspx> to review the current list of sanctioned countries, and consult with the Office of Compliance if you are uncertain whether OFAC sanctions apply to the country to which you plan to travel.

In addition to Travel Warnings, the State Department issues consular information sheets for every country in the world, which include the location of the US Embassy in that country, health, crime and security information (including road and transportation safety), currency information, entry regulations, and more. You should always download the consular information sheet for the country to which you are traveling, regardless of destination. To obtain a current consular information sheet, please visit http://travel.state.gov/travel/cis_pa_tw/cis/cis_4965.html.

You should also enroll in the State Department's Smart Traveler Enrollment Program ("STEP"). This will place you on a consular list serve that provides time-sensitive updates from the local U.S. embassy in the country to which you are traveling. Please visit http://travel.state.gov/travel/tips/registration/registration_4789.html for additional guidance.

In addition, the Center for Disease Control and Prevention (CDC) maintains a "Traveler's Health" website (<http://wwwnc.cdc.gov/travel>) that issues travel notices to inform travelers about

current health issues related to specific destinations, and a “disease directory” regarding specific diseases, travel notices, and vaccination information.

Finally, the State Department provides general health and safety guidance for international travelers, addressing issues such as vaccinations, travelling with disabilities, help for victims of crimes, road safety, and emergency information. Please visit http://travel.state.gov/travel/tips/safety/safety_1180.html and http://travel.state.gov/travel/tips/health/health_4971.html for additional detail.

Who is traveling?

Faculty/Staff: USC faculty and staff who are traveling internationally should purchase commercial transportation using a USC Travel Card or with a USC Contract Travel Agency. Doing so provides supplemental insurance coverage, allows USC to track the whereabouts of business travelers in case of emergency, and facilitates return travel. Please visit <http://fbs.usc.edu/depts/travel/page/3765/emergency-procedures/> for more detail. Faculty/staff performing research should also notify their Research Dean in instances where they intend to travel to countries with Travel Warnings.

Students: All USC sponsored or affiliated student international travel must adhere to USC’s Policy for Student-Led International Travel (<http://studentaffairs.usc.edu/files/2013/06/Memo-and-Policy-for-International-Student-Travel-FINAL.pdf>). This includes travel: (1) under the specific direction of a University school or department; (2) initiated by a student-led organization affiliated with USC; and (3) travel in connection with an individual faculty member’s academic or research activity. The policy addresses USC Health Insurance for student travelers, release forms, required health and safety information, and pre-trip orientations and preparation. All instances of student travel to countries for which the State Department has issued a Travel Warning require USC Student Affairs and Provost approval. Please contact Student Support and Advocacy in USC Student Affairs for assistance. (<http://studentaffairs.usc.edu/departments/ssa/ssa-overseas/>)

What are you taking with you?

Laptops: You can bring your laptop, as long as it does not contain any export-controlled documents or non-commercial, special purpose encryption software. If the laptop contains only the commercial encryption software that is standard for the computer, then you do not have an export controls issue (unless traveling to an OFAC-sanctioned country). If you have something other than standard commercial encryption software on your laptop or you are traveling to an OFAC-sanctioned country, do not bring it with you before consulting with Office of Compliance.

Export controlled information: The vast majority of research that takes place at USC is considered “Fundamental Research” under export control regulations. This includes all information and software that is published and is generally accessible to the interested public through publication in books or periodicals available in a public library or in bookstores, or information that is presented at a conference, meeting, seminar, trade show or other open

gathering. Published information and software also includes information or software made available on web sites accessible to the public for free and without the host's knowledge of, or control of, who visits or downloads software or information.

Export control regulations also provide an exception for published educational information, which includes USC course material published in the course catalog and open to the public.

If the information you bring with you falls within either of these categories, you do not have any export control concerns. However, if the university has accepted restrictions on the free dissemination of the information received or generated in the course of a research project, or has agreed to research personnel access restrictions (usually on the basis of nationality), then export control regulations apply, and an export license may be required prior to taking the information outside the United States. If you plan to bring information abroad where you know the university has accepted restrictions on dissemination or access, contact the Office of Compliance before doing so.

Biological and Chemical Materials: Taking biological or chemical samples with you on an international trip constitutes an export under U.S. export regulations. For example, materials that could be used for manufacture of biological or chemical weapons, chemicals that are used as propellants and high explosive materials may require specific export licenses depending on the country to which you are travelling. Also, there may be specific health and safety requirements to follow in order to safely transport these materials. If you intend to bring biological or chemical materials with you on an international trip, consult with the Office of Compliance before doing so.

Who will you be working with on your trip?

Foreign Corrupt Practices Act (FCPA): The FCPA makes it unlawful to offer something of value to foreign government officials in order to obtain or retain business, direct business to a particular party or otherwise obtain an unfair advantage. The business to be obtained or retained need not be with a foreign government or foreign government instrumentality, but may be private. USC personnel may not offer or make payments to a foreign official in order to:

- influence the individual's acts or decisions;
- induce the individual to violate his or her lawful duty;
- obtain any improper advantage; or
- induce the foreign official to use his or her influence improperly.

The prohibited payments need not only be monetary, but may consist of anything of value (i.e. meals or other gifts).

If you have any questions regarding the FCPA and how it may apply to a specific trip, please contact the Office of Compliance.

OFAC: As noted earlier, when the Treasury Department through the Office of Foreign Assets Controls issues sanctions against a particular country, travel is either is either greatly restricted or

prohibited. In addition, as part of its enforcement efforts, OFAC publishes a list of individuals and companies owned or controlled by, or acting for or on behalf of, targeted countries. It also lists individuals, groups, and entities, such as terrorists and narcotics traffickers designated under programs that are not country-specific. Collectively, such individuals and companies are called "Specially Designated Nationals" or "SDN's." Their assets are blocked and U.S. persons are generally prohibited from dealing with them. Please visit <http://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx> for a current list of SDN's, or contact the Office of Compliance for screening assistance.

How will you protect the information you are taking with you?

International travel poses unique risks compared to domestic travel. The difference in legal statutes between nations and the process of crossing international borders can frequently render typical security controls we use to protect sensitive data unworkable. Once in the country, risks to data continue from other areas besides physical loss. Digital espionage is a growing concern and researchers are often the target. The goal isn't always the data you have on you at the time, but also what you may have access to when you return. Please keep in mind the following tips when traveling internationally:

- Do not store sensitive data on any internal or external local media
- Leave any sensitive data stored securely on USC servers. If you need to access the data, do so via secured communications (i.e. VPN)
- All information you send electronically by fax machine, computer, or mobile phone – can be intercepted, read, deleted, and modified. Wireless devices are especially vulnerable.
- Sanitize your mobile device to ensure no sensitive contact, research, or personal data is on it. If feasible, use a "clean" device, and a new email account while traveling.
- Don't take information you don't need, including sensitive contact information. Consider the consequences if your information were stolen.
- Change Wi-Fi and Bluetooth settings so that they are non-discoverable.
- Don't leave electronic devices unattended.
- Don't use USB flash drives given to you – they may be compromised.
- If you absolutely have to use your USB flash drive in a foreign computer, assume you've been compromised; do not use that USB flash drive again – it is not a trusted device.
- Don't open emails or attachments from unknown sources. Don't click on links in emails. Empty your "trash" and "recent" folders after every use.

For additional guidance, please contact the Office of Information Security at (213) 821-2614.

What if something goes wrong on your trip?

As noted earlier, USC Travel Management Services provides guidance to travelers in cases of emergency, and also oversees to USC's Travel Emergency Hotline, who can be reached in cases of emergency at (213) 821-1042. Please visit <http://fbs.usc.edu/depts/travel/page/3765/emergency-procedures/> for additional information.

For overseas programs, USC's Overseas Emergency Response Plan provides guidance to all faculty, staff, and administrators responsible for implementation of USC's overseas programs in connection with crisis or emergency situations (e.g., accident, death, illness, arrest/legal problems, kidnapping, natural disasters). The Plan explains the security precautions to be taken prior to departure, actions to take upon arrival, and responding to crisis/emergency situations. It also provides a template to develop location-specific information and procedures applicable to the program location. This information should be provided to all participants in the overseas program, and should also be held by the on-campus contact person, on-site contact person, and Student Affairs. Please visit http://studentaffairs.usc.edu/files/2012/04/overseas_responseplan_june2010.pdf to review the Overseas Emergency Response Plan.

Useful contacts:

Student Affairs: <http://studentaffairs.usc.edu/departments/ssa/ssa-overseas/>

Travel Management Services: http://fbs.usc.edu/depts/travel/contact_us.aspx

Travel Emergency Information: <http://fbs.usc.edu/depts/travel/page/3765/emergency-procedures/>

USC Travel Emergency Hotline: (213) 821-1042

Office of Compliance: ooc.usc.edu

Office of Information Security: ooc.usc.edu