University of California, Irvine

Guidelines for Student International Activities

UCI SIA Policy: www.policies.uci.edu/policies/pols/420-10.php

UCI SIA Procedure: www.policies.uci.edu/policies/procs/420-11.php

For more information on the UCI Guidelines for Student International Activities, please contact the Global Risk Manager at global@uci.edu

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Introduction

UCI is committed to providing international travel opportunities for study, research, service, training, and other activities that fulfill our mission. These Guidelines are established standards to reasonably ensure that these activities are conducted safely.

The UCI Student International Activities Committee provides advice and guidance on the content and direction of the Guidelines.

As a member of the Forum on Education Abroad, the office Standards Organization for the field of Education Abroad in higher education, UCI has developed its Guidelines in keeping with the Forum's <u>Standards of Good Practice</u>.

*Activities that cannot meet these Guidelines will work with the UCI Global Risk Manager to develop acceptable alternatives. Exceptions/exemptions require approval by the UCI International Risk Review Team (IRRT).

Definition of Guidelines

"UCI requirements for conducting Student International Activities to reasonably ensure comprehensive health and safety appropriate to the <u>Student</u> and the <u>Student</u> <u>International Activity</u>. For example: the Guidelines will be different for an undergraduate student group than for a graduate student conducting independent research."

Sec. 1. Participants

This section defines the qualifications, expectations, and responsibilities of being a Participant, usually a UCI student, of a proposed Student International Activity (SIA).

A. Eligibility Requirements

- 1. Undergraduate students will be full-time, degree-seeking in good academic standing at the time of application and participation.
- 2. Graduate students will be making <u>satisfactory progress</u> toward the completion of their degree as defined by the UCI Graduate Council and the Graduate Division.
- Students will not be on <u>disciplinary or academic probation</u> nor have any other student conduct sanction unfilled during the intended term abroad.
- 4. Any student under 18 will need parental/guardian consent.

B. Responsibilities

1. Registration

a. All Participants will register their activity, travel itinerary, local and emergency contacts, as well as personal contact information in the UCI Abroad portal. Participants will sign a liability waiver and agree to adhere to the student code of conduct while abroad.

2. Orientations Sessions

a. All Participants will attend all pre-departure and on-site orientation programs made available by the Study Abroad Center and, where applicable, their Program Leaders.

3. Communication

- a. All Participants will provide primary and emergency contact information to the Study Abroad Center in UCI Abroad. Additionally, all Participants will enroll in the UC Travel Insurance, which provides emergency information provided by UC's security provider, currently Crisis 24/World Aware.
- b. Email will be the primary method of communication between the participant and the Study Abroad Center. Secondary or alternative methods may include telephone, text, or other electronic methods of communication supported by UCI.

4. Travel Insurance and Benefits Program

a. All Participants will enroll in the UC Travel Insurance and familiarize themselves with the benefits available through the supplemental basic accident & sickness insurance and emergency response plan. Participants shall be advised to keep a copy of their insurance card with them at all times.

5. Emergency Response

a. All Participants will be registered in the UC Travel Registry, attend a pre-departure orientation session (students) or consultation session (leaders), and complete all application and post-acceptance forms, including the UCI Liability Waiver, required by UCI Study Abroad Center in the UCI Abroad portal.

Sec. 2 Independent Activities & Travel

UCI recognizes its students will engage in independent international activities outside the United States. The following Guidelines are in place to support all graduate, undergraduate, and professional students (Participants) engaging in activities outside formal study abroad, exchange, or faculty-led programs.

A. Risk Assessment & Orientation

Participants will follow these steps to go through the risk assessment process, register their Independent International Activity with the Study Abroad Center, attend a pre-departure orientation, and enroll in UC Travel Insurance:

Step 1: Student registers their Independent International Activity with Study Abroad Center via the <u>UCI Abroad</u> portal, where they also complete a comprehensive risk

assessment covering travel and immigration requirements, federal security advisories, and eight categories of risk related to the activity, location, and duration.

- **Step 2:** UCI global risk manager reviews the risk assessment; also, confirms whether student will have adequate access to services of UC Travel Insurance. If there are concerns or the activity falls outside the UC insurance policy, the global risk manager forwards it to the International Risk Review Team (IRRT) for review.
- **Step 3:** Global Risk Manager replies to student with results of the review and works with them to prepare risk mitigation strategies. The Study Abroad Director and the student's activity advisor or supervisor will be copied on the message.
- **Step 4:** When the student is ready, they sign a student liability waiver and the student assumes responsibility for their travel decisions.
- **Step 5:** Student registers their travel and emergency contacts with Study Abroad Center, enrolls in UC Travel Insurance, and attends pre-departure orientation meeting scheduled with the Global Risk Manager.

B. Graduate & Professional Students

All graduate and professional students will follow the process outlined above. UCI recognizes that graduate students enjoy a greater amount of autonomy and responsibility when compared with undergraduate students. The UCI global risk assessment requirement is designed to support our graduate students who go abroad independently by providing them with an opportunity to discuss and plan for potential risks abroad, while providing advice and information on UC insurance and other services provided by UCI to our students.

Sec. 3. Faculty-led Programs

This section outlines the Guidelines required of any proposed Student International Activity (SIA), such as Faculty-led Programs. Programs that require the assistance of a non-UCI entity, partner institution, or third-party program or service provider should also consult the "Guidelines for UCI Affiliates" in addition to the following Guidelines.

Programs that do not meet these Guidelines will work with the UCI Global Risk Manager to develop acceptable alternatives. Exceptions/exemptions require IRRT approval.

A. Reviews & Approvals

All Activities must be reviewed and approved for risk, which include the following:

1. Site Assessment for Risk

Program leaders and/or UCI Affiliates shall complete a Site Assessment for Risk with the Global Risk Manager to identify potential hazards/risks associated with the proposed Student International Activity and location(s), which will serve as the basis for the risk assessment and review.

A follow-up review will take place, generally 2-4 weeks before the program start date or as determined by program leadership, study abroad center, and the global risk manager to confirm on-site conditions remain optimal for the program.

2. UCI Affiliate Review

UCI may enter into an agreement with an academic institution or consortium of academic institutions to facilitate a variety of <u>Student International Activities</u>, such as, but not limited to, exchanges, collaborative research, or joint delivery and supervision of an academic program or project. In addition, UCI may contract with an <u>Independent Program Provider</u> to support a student international activity administered, sponsored, or otherwise endorsed by UCI.

The aforementioned non-UCI entities are identified in UCI policy as UCI Affiliates and may be engaged to provide services such as the following on behalf of UCI:

Housing and/or Meals

Instructional space

Local guides, drivers, administrators, and instructors

Crisis Communications & Emergency Response

3. Departmental Approval

All programs must be approved by the home department or school for aspects of the program unrelated to risk such as academic, financial and administrative concerns.

B. Host Country/Region

Activity location(s) will be reviewed and approved for risk, which include, but not limited to, regulatory, travel, and national security concerns.

Program Leaders should take the following into account when selecting an activity site:

- 1. Host countries or regions should have functional U.S. diplomatic relations and regular commercial flights.
- 2. Seasonal weather conditions (e.g. hurricane season, snowfall, monsoons, temperature) and climate concerns should be taken into account.
- Program Leaders should consult country reports and travel advisories available from federal sources such as the U.S. State Department, CDC, and the Overseas Security Advisory Council, as well as local sources.
- 4. U.S. federal government advisories, such as those issued by the U.S. State Department or Centers for Disease Control and Prevention, that advise "Do Not Travel" will require a review by the GRm to determine how the warning applies to the proposed travel. This may also require a review by the IRRT.

Immigration & Entry Requirements

- 1. Program Leaders should be knowledgeable on entry requirements, visas, required and suggested vaccinations, and any quarantine procedures of the host country. Entry requirements should be verified with the State Department and country Embassy or consular authorities.
- 2. Program Leaders should recognize that Participants will have varying entry requirements based on the kind of passport or travel document they possess, duration of stay in the country, and nature of the activity.
- 3. Participants & Leaders must be able to enter and remain in the destination country for the duration of the program.

C. Program Leadership

The Program has clearly established leadership (see Sec. 4), as well as UCI departmental sponsorship and on-site support that ensures the appropriate knowledge, training, linguistic skills, and cultural familiarity necessary to respond to and advocate for the health and safety needs of students.

1. Two program leaders are required for faculty-led programs, one of whom must be a UCI faculty member as defined above; the secondary program leader may also

- be from the UCI faculty, but also may be a UCI graduate student, staff member, or other party who is employed by UCI.
- 2. UCI Program Leadership may not authorize any other party to assume their responsibilities at any time during the program. On-site staff of UCI Affiliates may complement the Program Leadership when and where appropriate. Parties who are sub-contracted to provide services, such as tour guides or drivers, do not qualify as part of the program leadership.
- 3. Spouses/Partners of Program Leaders generally may not be considered secondary program leaders unless they meet all other criteria for Program Leadership.

D. Participant Selection

Eligibility Requirements & Selection Process

- 1. The Program shall provide a clear statement as to who the Participants are (i.e. undergraduates, graduate students, professional, medical, etc.)
- 2. Clear eligibility requirements and prerequisites appropriate for the activity and location of the program must be established to ensure student participants are able to succeed in the learning environment. This may include a minimum GPA, prior language study, completion of specific coursework at UCI.
- 3. Requirements should not be lowered to accommodate additional participants in the event of low enrollments.
- 4. A transparent application process, including deadlines and timeline for notification, is in place.
- 5. A transparent selection process, including selection criteria is in place.
- 6. The Selection Committee shall include at least one other UCI employee in addition to the Program Leader.

E. Logistics

Program Dates & Itinerary

- 1. The program shall have precise start and end dates and arrival/departure instructions that are available to all participants.
- 2. The program has a detailed itinerary and daily agenda for the duration of the program.
- 3. Program start and end dates will be entered into the UCI Abroad portal.
- 4. A clear distinction should be made between required and optional program activities, and personal time.

- 5. Clear guidance shall be provided as to all travel arrangements, including recommended arrival and departure points, and meeting locations.
- 6. Participants will upload a copy of their flight itineraries into the UCI Abroad portal and enter travel itineraries as part of the UC Travel Insurance enrollment.

Transportation

- 1. No personal vehicles should be used to transport program Participants.
- 2. All vehicles should have working seat belts.
- 3. When contracting for ground transportation, keep in mind possible special needs of students (e.g., physical needs, needs among group members, and interaction with host nationals). Transportation providers must guarantee safe transportation in well-maintained vehicles by licensed and insured companies and drivers. UCI faculty or staff who will be driving should complete. Refer to UCI guidelines for insurance (contact: Chris Richmond, UCI Risk Services) https://www.ucop.edu/risk-services-insurance/_files/certificate-of-insurance/general_ins_limits_rev111313.pdf
- 4. UCI undergraduate students are not permitted to drive while abroad.
- 5. Participants or Leaders may not drive or operate a motorcycle or scooter during the program.

Housing & Meals

- 1. Participants shall be housed in locally licensed facilities, such as:
 - a. Professional/commercial facilities, like a hotel.
 - b. Housing owned, operated, or approved by a local university partner.
 - c. Housing or homestays arranged through a licensed operator.
 - d. AirBnB rentals must be booked through the UCI Connexus portal and include UC requirements, which include smoke detector, CO2 detector, wifi, as well as bedrooms and bathrooms with doors that can be locked from the inside. Participants may not /should not be advised to book their own AirBnB accommodations independently.
- 2. Program leaders must reside in the same location or in close proximity (i.e. walking distance) to participants and must be available to student participants at all times throughout the duration of the program day and night for emergencies.
- 3. Accommodations for Participants with disabilities should be considered when selecting housing in consultation with UCI Disability Services.
- 4. The following elements should be taken into consideration when selecting program accommodations:
 - a. Safety & Security:
 - i. Neighborhood safety and security.

- ii. Security windows and doors, including locks with keys on building doors and separate locks on individual rooms.
- iii. Bedrooms can be locked from inside.
- iv. CO2/smoke detectors are present and functioning.
- v. Fire extinguisher(s) present and functioning.
- vi. Two means of egress to the building.
- vii. No cameras should be located in private spaces.
- viii. Protection against insects and vermin.
- ix. Services to maintain clean communal living areas.
- x. Proper ventilation.
- xi. Shower & toilet facilities; if shared, facilities must be lockable.
- b. Communication services
 - Wireless internet access.
 - ii. Cellular phone service.
 - iii. Regular postal service.
- Location of housing
 - a. Accessible by foot, local transportation, etc.
 - Walking distance to services, such as grocery stores, medical providers, etc.

Food & Drink

- 1. The Program will provide clear details as to what meals are provided by the program and what meals are the responsibility of the student.
- 2. Participants should be provided an opportunity to discuss dietary restrictions or requirements, and should be advised in advance of available options.
- 3. Potable water must be available or should be provided to students in bottles when not otherwise readily available.
- 4. Safe food must be available at reasonable cost and distance with the understanding that availity and variety will vary widely based on location (e.g. rural destinations vs. urban locations).

Insurance

- 1. All Leaders and Participants must be enrolled in UC Travel insurance.
- 2. Program activities must be insurable through the UC Travel Insurance (to be verified by Global Risk Manager)
- 3. UCI Affiliates must maintain the appropriate insurance coverage per UC policy (e.g. General Liability, auto, cybersecurity and data protection)

Medical Care

The medical needs of all Participants shall be taken into consideration throughout the planning and implementation of the program including, but not limited to, the following:

- 1. Participants shall have access to medical care facilities at the program destination(s).
- 2. Emergency medical care for stabilization must be available within 30 minutes using locally available transportation.
- 3. Verification of whether Insurance (provided by UC or UCI Affiliate or both) has a relationship with a medical care facility near the program to make direct payments on behalf of program participants.
- 4. All Participants shall be given an opportunity to disclose specific health care requirements prior to the start of the program, in a manner that does not exclude their participation or selection for the program.

F. Communications & Emergency Response

A robust communications plan will include a means to communicate with UCI, between the Leaders and Participants, and among Participants. The content of this section is complementary to the material covered in the pre-departure orientation session provided for students.

- The Program Leader will have developed a plan for communications among program participants, and between the Program Leader and the UCI Study Abroad Center and UCI Affiliates (where applicable), for purposes of health, safety, and emergency response. The plan may include a phone tree distributed to all students, information about what type of incidents should prompt students to activate the phone tree.
- 2. All Program Leaders and Participants are required to have a working cell phone on site that can be used locally and internationally. The number must be distributed to all group members for emergency use and must be provided to the Study Abroad Center. For remote locations where cellular service is not available, Program Leaders must travel with a satellite phone.
- 3. Program leaders will check-in on the first day, at mid point, and the last day of the program with the Study Abroad Center.
- 4. Alternatives to phone and internet connection should be included in the event that the communication systems may be down in the event of an emergency.

Emergency Action Plan

- An Emergency Action Plan is a best practice in the field of Education Abroad for communication and reporting between Program Leadership, home campus, and emergency services.
- Leaders will have developed an Emergency Action Plan for their program to
 ensure that communication between the Program and the Study Abroad Center
 remains consistent throughout the program. The Emergency Action Plan will be
 kept in the Study Abroad Center and with the Program Leaders for use in the
 event of an emergency.

It will contain the following information:

- 1. Name and dates of program, plus countries to be visited during program
- 2. Name and e-mail address of all Program Leaders.
- 3. Primary and Secondary forms of communication between Leaders and Participants.
- 4. Program Leader cell phone number.
- 5. Copy of the program itinerary or syllabus
- 6. Name, address, and phone number of hotel, hostel, residence hall in which faculty and students stay.
- 7. Local emergency phone numbers and medical care facilities.
- 8. Check in and check out dates for each location.

International Risk Review Team (IRRT)

1. The International Risk Review Team is responsible for evaluating and responding to international emergencies that involve UCI Students and Participants and for fulfilling the Standards. (see IRRT in this section)

G. Orientation & Student Conduct

Pre-departure Orientation

- 1. The Program has a clearly defined set of orientations for pre-departure, on-site, post-program debriefing.
- 2. Students must participate in a pre-departure orientation meeting hosted by the Study Abroad Center, which include material on the following topics:
 - a. Financial Matters
 - b. Travel Documents
 - c. Itineraries and Entry Requirements
 - d. Insurance

- e. Health & Safety
- f. Situational & Cultural Awareness
- g. Drugs & Alcohol
- h. Sexual Harassment and Assault, including Title IX OEOD support
- i. Discrimination and Identify-based Violence
- j. Emergency Contacts
- Program Leaders will attend a pre-departure consultation meeting hosted by the Study Abroad Center and Global Risk Manager

Student Code of Conduct

- 1. The Program has a clearly articulated code of conduct and disciplinary procedures developed in consultation with the Study Abroad Center and relevant UCI parties.
- Code of Conduct shall align with UCI policies on campus
 (https://aisc.uci.edu/policies/pacaos/) and includes protocol for expulsion from program, and return to campus. UCEAP model
 http://eap.ucop.edu/Documents/Policies/1920/student conduct discipline.pdf)

Title IX and Clery Act Reporting

- 1. Program Leaders will provide Title IX and Clery requirements and reporting process to Participants.
- 2. Program Leader and SAC should be familiar with local protocols and procedures to respond to sexual assault.
- 3. Further Guidelines to be developed in consultation with OECD as reporting requirements evolve.

H. Program Administration

Budget & Contingency Funds

- 1. The program has a budget with a minimum number of participants. (see sample program budgets with SAC)
- 2. The program has access to a contingency fund for emergencies. (see sample program budgets with SAC)

Withdrawal & Refunds

1. The Program has a clearly articulated withdrawal & refund policy for both voluntary and involuntary withdrawals.

Scholarships & Financial Aid

- 1. If the Program offers any financial aid or scholarship support, the funding source must be disclosed for transparency and/with explicit selection criteria and who will be on the selection committee.
- The selection committee must include at least one person from UCI besides the program leader. Consider including a staff member from the Study Abroad Center.

Distributed Authority & Shared Oversight

Programs shall operate under the following shared authority and oversight:

- 1. Dean responsible for financial commitments.
- 2. Department responsible for academic oversight, including learning purpose of international site.
- 3. Program Leader responsible for program development and implementation.
- 4. Study Abroad Center responsible for program approval, student application, student registration, and risk management.
- 5. Global Risk Manager for risk assessment, insurance registration, & orientations.
- 6. International Relations Council responsible for matters of reputational risk and regulatory oversight.
- 7. Export control responsible for guidance on restricted locations/entities.
- 8. IRB for research approval.
- 9. International Agreements officer for contracts.
- 10. Procurement for non-UCI vendor agreements (see UCI Affiliates).
- 11. Campus Risk Manager for General Liability Insurance, Waivers.
- 12. IRRT for exceptional review and approvals

I. Leader Consultation Sessions

Managing risks abroad is a shared responsibility. In addition to their familiar academic and administrative roles on campus, Leaders also take on responsibilities when traveling with UCI students abroad that are not usually encountered while teaching on campus. Details such as program and travel logistics, budgeting, helping students engage with the host culture, dealing with student (mis)conduct, social life, homesickness, and group dynamics, as well as responding to COVID-19 regulations, medical emergencies, natural disasters, sexual assault, discrimination or identity-based violence requires a coordination of efforts at which the Leader abroad is at the center.

To assist Leaders in these efforts to ensure the health and safety of UCI students abroad, the Study Abroad Center and Global Engagement Office host a Program Leader Consultation session to discuss the role and responsibilities of the Program Leader and the resources available to support them throughout the program.

The Consultation Session includes, but is not limited to, the following topics:

- 1. Current regulatory, travel and national security concerns
- 2. Leader role and responsibilities
- 3. Planning for Arrival/Departure and Immigration Issues
- 4. UCI Travel Insurance and United Healthcare Global Medical Assistance
- 5. Student Conduct Abroad
- 6. Health & Medical Support
- 7. Communications and Emergency Action Plan
- 8. Incident Reporting, Clery, & Title IX
- 9. COVID-19 Protocols
- 10. Logistics of orientation
- 11. Program/site-specific topics

Sec. 4. Program Leaders

This section defines the qualifications and responsibilities necessary at UCI to serve as a Leader of a proposed Student International Activity (SIA), such as a faculty-led program or other activity that requires on-site leadership.

Leaders will comprise the "Program Leadership" as discussed in the Guidelines for Programs. In addition to supporting the academic and co-curricular development of students, Leaders provide the appropriate subject-matter expertise, linguistic and cultural familiarity, and administrative support necessary to respond to and advocate for the diverse health, safety, and security needs of all Participants.

A. Qualifications

SIA leaders will possess the following:

- 1. Full-time UCI academic appointment (e.g. professor, lecturer, staff).
- 2. Knowledge and expertise to achieve the goals of the program.
- 3. Proficiency in local language and/or familiarity with the local site.
- 4. Previous experience leading or supervising student international activities and positive collaboration with Study Abroad Center and Global Engagement.

- 5. Commitment to follow policies, procedures, and guidelines of UCI, UC Regents, the State of California and the U.S. government, as well as the host institution, UCI Affiliates, and the host country.
- 6. Willingness and ability to support the health, safety, and security of Participants.
- Organizational planning skills necessary to track numerous details. simultaneously.
- 8. Enthusiasm to spend time speaking with students to promote the program.
- 9. Willingness to handle the physical and emotional demands of the program.
- 10. Willingness to take charge in any situation where students need to be directed, rather than consulted.
- 11. Appreciation for the increased contact with students inherent to study abroad.
- 12. Leaders who cannot meet these Guidelines will work with the UCI Global Risk Manager to develop an acceptable combination of expertise and skill level among the program leadership.
- 13. Exceptions/exemptions will require IRRT approval.

B. Responsibilities

1. Registration

- a. Seek appropriate Risk Management, SAC, Departmental, and Contracts/Procurement approvals to register the program as an official UCI Student International Activity (SIA).
- b. Support the registration process for all UCI participants in the UCI Abroad portal and timely enrollment in the UC Travel Insurance.

2. Orientations and Leader Information Sessions

- a. Attend a Leader consultation session offered by the Study Abroad Center (SAC) to prepare for program leadership and administration.
- b. Collaborate with the Study Abroad Center to offer a pre-departure orientation hosted by the Study Abroad Center (SAC) for all participants.
- c. Facilitate on-site orientations for Participants once abroad.
- d. Establish community standards and behavioral expectations.
- e. Explain cultural, physical, and behavioral requirements of foreign venue.
- f. Remind Participants of their role as representatives of UCI.

3. Communication

- a. Maintain active communication with Participants and UCI main campus.
- b. Consult with SAC to determine primary and secondary modes of communication (e.g. email, phone, text, VOIP, sat phones, WhatsApp).
- c. Perform regular check-ins with Study Abroad Center during the program.
- d. Identify and communicate potential risks and plans to Participants.
- e. Maintain current contact information for campus support offices.

- f. Consult with SAC before adjusting the itinerary, modes of transport, UCI Affiliates, or formal program activities.
- g. Keep SAC informed of Participant status changes, such as disenrollment, probation, major illness, accidents, and protracted absence.

4. Travel Insurance and Benefits Program

- a. Register for the UC Travel Insurance and familiarize oneself with medical and emergency support services available.
- b. Request a list of medical facilities at the program location from the UC Travel Insurance medical care provider: United Healthcare Global until June 1, 2022, AXA after June 1, 2022...
- c. Maintain confidentiality with student health, including student health forms and diagnoses, to effectively deal with individual health emergencies.
- d. Support Participants in collecting documents to submit insurance claims.

5. Emergency Response

- a. Submit an Emergency Action Plan with the Study Abroad Center.
- b. Be on-call 24/7 while the SIA is in session and Participants are present.
- c. Remain on site until the program has officially ended and, in exceptional cases, until all Participants are able to depart the program/location.
- d. Report incidents following UCI procedures for Title IX and Clery reporting.
- e. Avoid potential Conflicts of Interest and Commitment that compromise the ability to prioritize the health, safety, and security of the Participants.YES!

C. Other Participants

- 1. Teaching faculty
- 2. Locally hired/contracted support
- 3. Alumni
- 4. Spouses/Partners/Family members

No one other than those individuals involved in the activity as Program Leader, Participant, or UCI Affiliate may participate in formal program activities, as priority must be to the enrolled Participants of the program. While UC Travel Insurance may cover a traveling companion, the UCI Program Leadership will not be in a position to offer attention to those individuals not affiliated with the program, including spouses/partners or family members, in the event of an emergency. UCI cannot accommodate the risk concerns that may arise due to the presence of a spouse/partner or family member during a UCI Student International Activity.

Sec. 5. Conflict of Interest and Integrity

UC Policies on Conflict of Interest and Integrity also apply to faculty/staff involved in the development of Student International Activities, such as faculty-led study abroad programs.

UCI faculty and staff should be particularly sensitive to situations which might pose a real or perceived conflict of interest. Program Leaders should provide explicit selection criteria that can be shared for transparency and state who will be on the selection committee.

Examples of conflicts of interest might include:

- 1. A program leader receiving perks or payments from an affiliate or overseas partner for leading or bringing a certain number of students.
- 2. Using a travel vendor such as a hotel, tour company, etc. owned or managed by a close friend or relative.

Program leaders should work with their business operations staff to ensure compliance.

Sec. 6. Emergency Response (IRRT)

- 1. UCl'S International Risk Review Team is responsible for evaluating and responding to international emergencies that involve UCl Students and Participants and for fulfilling the Standards.
- 2. The team will be convened by any member of the team for emergency response as needed
- 3. The team will invite the dean or vice chancellor of the unit responsible for the International Activity to attend the team meeting
- 4. The team may invite subject matter experts to attend as needed.
- 5. The team will evaluate the International Activity and Emergency Situation, consider possible responses and determine a plan of action.
- 6. The team will communicate the plan of action to the dean or VC of the responsible unit with a copy of the P/EVC and VCABS.
- 7. The team will communicate with those responsible for taking action.
- 8. The team will coordinate with the UC travel insurance provider and on site personnel.
- 9. The team will communicate with those affected and with their emergency contacts.

Sec. 7. UCI Affiliates

UCI may enter into an agreement with an academic institution or consortium of academic institutions to facilitate a variety of <u>Student International Activities</u>, such as, but not limited to, exchanges, collaborative research, or joint delivery and supervision of an academic program or project. In addition, UCI may contract with an <u>Independent Program Provider</u> to support a student international activity administered, sponsored, or otherwise endorsed by UCI.

UCI Affiliates are expected to meeting the following Guidelines as applicable to support the administration and delivery of a UCI Student International Activity:

- 1. Affiliate must be licensed and insured to operate in the host country. If an academic institution, the Affiliate must also be accredited by an official nationally recognized accrediting authority
- 2. Affiliate must have been in continuous operation for at least 5 years.
- 3. Affiliate must receive satisfactory reviews from at least five AAU member schools with no significant concerns or reservations expressed.
- 4. Affiliate must have an office, campus, or other facility with on-site support staff who are readily accessible in the host location. The local office address, address of registration, and names with titles of local management and staff must be furnished.
- 5. Affiliate must maintain General Liability Insurance in the amount of \$1 to \$2 million USD; Cyber & Privacy insurance, automobile and workers' compensation, if applicable. Refer to Chris Richmond, UCI Risk Services
- 6. If Affiliate is responsible for medical care arrangements, Affiliate should provide a list of medical care providers and facilities to determine which are available through UC insurance policies.
- 7. Affiliate must provide information regarding the following, where applicable, depending on the services they are contracted to provide:
 - a. Participant Regulations & Requirements (including visa & immigration info.)
 - b. Student Conduct Code

- c. Housing (incl. proximity & travel to instruction site)
- d. Health & Safety Issues and mitigation strategies
- e. Emergency Action Plan
- f. COVID-19 Response Plan
- g. Ability to comply with UCI anti-discrimination policy for student-related activities: (reference: https://aisc.uci.edu/policies/pacaos/appendix.c.php).
- 8. Affiliate must provide reasonable accommodations for students with special needs or disabilities.
- 9. Affiliate must be able to furnish students with information on local and regional risks.
- 10. Affiliate must facilitate cultural, logistical, and health and safety training for students before the program and support during the program.
- 11. Affiliate must have the capacity to support 24/7 communication, including the monitoring of in-country conditions. Early warnings, notifications, and recommendations should be communicated to the students, program leader, and UCI SAC.
- 12. Affiliate must provide plans for academic/instructional continuity in the event of quarantine, emergency, or disaster.
- 13. If program-sponsored excursions and co-curricular activities will be offered to students, Affiliate must execute appropriate vetting and risk mitigation for overnight stays and/or travel outside the region or host country.

In addition to Risk Management, additional reviews may be required for: Contracts, Procurement, Insurance, Import/Export Controls, and Sanctions.

The UCI Affiliate Review is conducted by the Global Risk Manager and will include the following details:

- Insurance certificate (General Liability, Automobile, Cyber Security as needed)
- 2. Contact information for 5 AAU university references with whom they've worked in the recent past

- Contact information for local staff & offices (name/title/email/office address) & and confirmation of their authorization to operate in the destination country
- 4. COVID-19 protocols
- 5. Verification of 5 years of operation

The UCI Study Abroad Center will maintain an updated list of direct exchange partners and third-party provider Affiliates that meet the guidelines and will review each Affiliate every three years.

Appendix A. Forms & Documents

UCI Liability Waiver for International Activities (sample)

UCI Communications & Emergency Action Plan (sample)

UCI Site Assessment for Risk

Appendix B. References & Resources

References:

Conflict of Interest and Conflict of Commitment resources:

- 1. Forum on Education Abroad Standards: https://forumea.org/conflicts-of-interest/
- 2. General overview: https://policy.ucop.edu/doc/1200679/CompendiumCOIPoliciesGuidance
- 3. Standard of ethical conduct (catchall): https://www.ucop.edu/ethics-compliance-audit-services/compliance/standards-of-ethical-conduct.html
- 4. UCI Health general statement: https://www.ucihealth.org/-/media/files/pdf/compliance/uci-health-code-of-conduct_pdf?la=en
- 5. Form 700-U (research forms) https://research.uci.edu/ref/conflict-of-interest/coi/index.html
- 6. Form 700 (regular forms) https://www.ucop.edu/uc-legal/legal-resources/index.html

UC Travel Insurance possible exclusions or limitations:

- 1. Travel to student's country of origin/citizenship.
- 2. Countries with U.S. sanctions: "When traveling to foreign countries in which a travel advisory has been issued, you will still be provided coverage under the policy. The issue will be that it may take longer to provide some assistance services that may be needed. Instability, political upheaval, unrest, airport closure, weather conditions, military actions or similar situations may cause delays. For foreign countries in which sanctions have been imposed against traveling or doing business in, no coverage will be provided, unless the State Department has approved for you to be and/or do business in that country. Please contact your local Risk Management office if this is the case. Sanctions have been imposed on travel to Cuba. The University has obtained a "Specific Educational License" from the U.S. Department of the Treasury's Office of Foreign Assets Control, on behalf of UC's ten campuses. The License authorizes qualified UC students, faculty and staff to travel to Cuba for educational purposes. The License is valid systemwide, is renewed annually, and is administered by the Office of the President, Office of International Academic Activities. For more information, go to http://www.ucop.edu/acadaff/oiaa/cubalicense.html"
- 3. "UHCG and World Aware and its international offices can provide assistance services in all countries of the world. Both medically necessary transport services as well as security/political extraction are available and are 100% payable benefits. Please consider, however, that in certain countries (current examples are Iraq and Afghanistan) or under certain circumstances providing assistance and transport services may not happen right away and may take longer than could be expected. Instability, political upheaval, unrest, airport closure, weather conditions, military actions or similar situations may cause delays."

Appendix C: Further Readings

Matthew L. Goode, "The role of faculty study abroad directors: a case study," *Frontiers: The Interdisciplinary Journal of Study Abroad*, Vol. 15, Winter 2007, pp. 149-172.

*This list will continue to grow