

Office of Global Safety

American University Faculty & Staff-Led Group Travel Planning Guidebook

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# **Office of Global Safety**

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# Section 1 Purpose of this Guidebook

Commitment of your time and expertise to providing a study abroad experience for American University students is the hallmark of American University's study abroad program. This Guidebook is meant to make planning short-term courses abroad easier for faculty and staff for a clearer and more consistent process and understanding of the trip leader's responsibilities.

This Guidebook includes important policies and information related to course planning, emergency protocols, and managing travel with students. Faculty and staff leading groups will be responsible for understanding and adhering to this Guidebook as well as compliance with other related university policies.

American University has a robust study abroad program and is internationally recognized for its efforts to further global learning and enhancing the educational experience of everyone involved in the study abroad experience.

The Office of Global Safety is but one part of the larger study abroad process. As changes in the educational process occur, this office will collaborate with appropriate stakeholders to revise its processes for furtherance of the program.

While this Guidebook is specifically designed to address international travel, the same parameters, thought process, and requirements should be employed for domestic travel.

# Section 2 Expected Outcomes for Study Abroad/Non-Credit Travel

Participation in an educational travel program abroad can be the highlight of a student's educational experience. As an alternative to a traditional study abroad experience, short-term faculty/staff led programs are an important option in the educational experience. These programs are a way to provide experiential learning through international education making it possible for those who cannot engage in semester-long study abroad.

Faculty/staff leaders have a responsibility to understand and comply with this Guidebook as well as all applicable policies and procedures for international travel. It is incumbent on you to seek clarification for any information which is not clear within this process. Please coordinate any questions with the designated department, study abroad and the Office of Global Safety.

#### **Courses Must Achieve Academic Purpose**

Study abroad experiences include coursework and experiential learning. Students should be instructed in a way that allows them to connect with a culture and have an opportunity to have individual reflection with students to best understand the country, culture, and its people.

#### **Fiscal Responsibilities**

Many students may face great financial pressure in completing their studies and a study abroad experience can create additional financial concerns. It is the leader's responsibility to try to balance the fiscal needs with logistics and academic content to maximize opportunities for participation by students struggling financially. While affordability is a consideration, it is important to understand that student safety is paramount to any program. Expense reports are required to be submitted immediately upon return to campus.

#### **Program Quality**

In developing short-term programs, an emphasis should be placed on the need to ensure high quality experiences commensurate with the quality of education at American University. International experiences should reflect the academic strengths of American University. High quality experiences should leverage the trip leader's expertise and integrate well into American University curriculum. These experiences should complement the existing curriculum rather than replicate it.

Secondary supervisor/leaders travelling with the lead-faculty member must be prepared to provide an important level of support, often significantly higher than on campus, for the participants, some of whom may be first time travelers. A minimum of two faculty/staff members must accompany any group but depending on the size of the group and the logistics involved, additional leadership personnel may be required for a given trip.

#### **Orientation Requirements**

In addition to any pre-departure orientation(s) which would provide the travelers with a foundational knowledge of the host country and its people, in order to ensure continuity of the information, the leader should provide an in-country orientation to reinforce those topics that have been discussed prior to arrival. A follow up meeting should take place upon return to encourage reflective learning.

#### **Student Financial Eligibility**

As a faculty/staff leader for this travel, you should be aware of and advise students about any student eligibility issues. Most students traveling must be registered full time for that particular semester, or for interim summer activities, the preceding semester. All travelers must be affiliated with American University; therefore, students must matriculate. For example, students who graduate in May cannot participate in summer travel opportunities. Those who do not meet eligibility will not be permitted to travel.

Some exceptions do exist for specific programs. Please consult your school's financial office or programming office to determine if an exception applies. For example, KSB's international immersions for online MBA and MSIRB programs often involves part time students.

# Section 3 Generalized Timelines for Planning and Approval of Faculty/Staff-Led Courses and Non-Credit Travel for Educational Purposes

#### 12-18 Months from Planned Departure

- Trip leaders will complete their proposal at the Department/School level and obtain preliminary approval from the department chair/Dean or requisite oversight for non-credit travel.
- Collaborate with Office of Global Safety to determine relevant risks/mitigation for potential travel.
  - The earlier in the process that the leader coordinates a risk review, the easier it becomes to overcome potential risks that require significant investigation, research, and mitigation.
  - This coordination includes a review of proposed itinerary, destinations, and allows for potential risks to be identified.

#### 8-12 Months Prior

- The faculty/staff member leading the trip should seek and obtain formal approval from the Department/Dean or authorized oversight.
- A preliminary budget should be developed.
- Coordination with locale partners, transportation requirements, other logistics issues
- Determination of secondary (additional personnel as needed) responsible party who will be traveling with the group as supervisory personnel and/or logistical coordinator.
- Continue to coordinate with the Office of Global Safety to review current plans/changes to initial itinerary.

#### 3-8 Months

- Faculty/staff recruit participants. Interested travelers will follow established department/school requirements for application and payment processing.
- Faculty/staff will determine the traveler's fitness by ensuring coordination with visas, passports, payment planning, and conduct an eligibility review for all travelers.
  - o Includes a review of academic and disciplinary standing with the school, and enrollment in the appropriate semester(s).
  - Ensure housing and flight coordination is in place.
- Continue to coordinate with the Office of Global Safety to review current plans/changes to initial itinerary.
  - The Office of Global Safety will address any risk related concerns, provide briefing and coordinate with approving authority.
  - o Formal submission of travel request should be made to the Office of Global Safety.

#### 2-3 Months

- Finalize budget based on total number of travelers
- Lock-in faculty/staff participation
  - The guideline is one faculty/staff member per five students. Some logistical issues could require additional oversight depending on the intricacies of the travel itinerary.
- Ensure the appropriate reservations are confirmed and unnecessary reservations are cancelled.

- Coordinate with the Office of Global Safety to review current plans/changes to initial itinerary.
- Schedule pre-departure orientation with Office of Global Safety
- Office of Global Safety will coordinate approvals through the specific school and notify the faculty/staff leader.

#### 1-2 Months

- Coordinate with Office of Global Safety a pre-departure orientation with the students and all traveling faculty/staff
  - Provide copies of all passports to Office of Global Safety
- Coordinate with travel group on all logistical matters and confirm all locale arrangements.

#### 1 Week

- Faculty/staff obtain any travel advances and logistical equipment, e.g., cell phone, laptop, etc.
- Conduct final meetings with travelers and supervisory personnel
- Contact Office of Global Safety to ensure that no adverse intelligence has been obtained
- Provide Office of Global Safety with final itinerary

#### **Day of Departure**

- Ensure that coordination is in place for transportation upon arrival at destination
- Communicate with Office of Global Safety and/or oversight upon successful arrival.

#### Post-Trip

- Faculty/staff leader submits financial paperwork per policy.
- Students submit program evaluation and meet with oversight for debrief.
- Reconcile course account and issue appropriate invoices/refunds

# Section 4 General Roles of Key Personnel in Preparing a Faculty/Staff-Led Trip

#### The Faculty/Staff Leader Role

The faculty and staff leaders traveling with students have many and varied responsibilities for the conduct of the trip both prior to and during the trip. Some of these responsibilities are listed below. It should be noted that some of these responsibilities may be handled by a school's program staff. Please consult with the programming office for specific roles and responsibilities.

#### 1) Program Design

- a) Identify and develop the appropriate course(s) within a particular program or create new course(s) and obtains approval of the course(s)
- b) Set admissions criteria based on the needs of the particular program
- c) Work with the Department and Dean to determine the host institution abroad (if applicable) and provide with any contacts
- d) Determine excursions and other experiential learning opportunities
- e) Determine the budget and number of students
- f) Determine any skills or experiences that would be helpful for a second support person to have identify the appropriate second support person
- g) Develops the program itinerary to be shared with secondary leader and students

#### 2) Recruiting

- a) Create content for programs in the appropriate technology solution.
- b) Recruit AU participants on campus

#### 3) Pre-Departure

- a) Provides course-specific pre-departure materials
- b) Participate in faculty director training(s) arranged by Office of Global Safety
- c) Participates in pre-departure orientation(s)
- d) Meets with designated contact to sign contract and arrange for travel advance
- e) Assists secondary leader in collecting documents as needed

#### 4) While Abroad

- a) Confirm the group's safe arrival with program staff within the first 24 hours
- b) Accompany students, participating in all scheduled activities
- c) Teach the course and coordinate with any overseas faculty/lecturers
- d) Act as Trip Leader in charge of the overall wellbeing of the students
- e) Handle all disciplinary issues with students
- f) Accompany students on any medical appointments/visits
- g) Act as first responder to any emergencies
- h) Resolve any housing issues that may arise on site
- i) Supervise excursions, making additional arrangements as necessary
- j) Hold regular office hours/meeting times with students
- k) Evaluate the students' work

#### 5) Upon Return

- a) Settle the program/travel account with your chain of command within 30 days of returning
- b) Submit grades within AU guidelines
- c) Meets with students to provide debrief and feedback on the program

d) Meet with program administration to evaluate the feedback

#### **Secondary Support Faculty or Staff Member**

This position serves in a student support capacity and is responsible for:

#### 1) Pre-Departure

- a) Participates in faculty leader training(s)
- b) Participate in pre-departure orientation
- c) Meets with designated PCD or other contact to sign contract and arrange for travel advance (if applicable)
- d) Assists in collecting documents, as needed

#### 2) While Abroad

- a) Confirm the group's safe arrival with the program within the first 24 hours
- b) Accompany students, participating in all scheduled activities
- c) Act as trip leader in charge of the overall wellbeing of the students
- d) Handle all disciplinary issues with students
- e) Accompany students on any medical appointments/visits
- f) Act as first responder to any emergencies
- g) Resolve any housing issues that may arise on site
- h) Supervise excursions, making additional arrangements as necessary

#### 3) Upon Return

- a) Settle the program/travel account with PCD/Accounting within 30 days of returning
- b) Meet to provide debrief and feedback on the program

#### 4) Academic Program Office

- a) Evaluate and approve program location and activities as required by the Office of the Provost
- b) Supplement student recruiting through normal channels
- c) Meet with faculty leaders to aid and prepare them with their abroad programs
- d) Make any arrangements at host site related to program logistics
- e) Arrange for group rates on flights to program destinations (in-country only all students must prepare their own round-trip international travel to the primary location of the course)
- f) Serve as resource for faculty leaders on all issues related to study abroad
- g) Consult on risk assessment issues such as student health, safety, and insurance
- h) Prepare program budget
- i) Collect and evaluate applications based on acceptance criteria set by faculty leaders
- j) Send acceptance emails to students
- k) Register students for study abroad programs
- I) Collect program deposits, tuition, and fees
- m) Arrange mandatory pre-departure orientation session
- n) Enroll students and faculty director in AU travel and health insurance
- o) Distribute online program evaluation forms to students at conclusion of program
- p) Arrange for payments to all program providers
- q) Process transcripts for non-AU student participants
- r) Serve as 24/7 AU communications point while students and faculty are overseas

## Section 5 Travel Logistics

A host of tasks must be completed for a successful trip. Please consider the categories of tasks listed below.

#### **Travel Arrangements**

Travel poses significant risks that must be mitigated. This is one of the most important aspects of the program. Whether it is flights, hotels, site visits or meals, these are core responsibilities for any program. Leveraging local contacts and third-party program providers can assist in ensuring a wonderful experience. Relying on third-party providers is an excellent way to expedite needs and details for the group. Partners are often USA-based organizations and have a strong understanding of the risk/mitigation process, including Title IX and CLERY.

#### **Transportation**

Concepts to address include whether to use a group flight or allow for independent arrivals in-country. Travel arrangements including distance to airports, weather issues, etc., can complicate travel. Transport to and from the airport can be fraught with peril depending on your destination country.

Considerations have to be made on whether safety is a factor on roadways, particularly at night.

- Often there are risk related issues associated with nighttime travel.
- Will armed security be needed?
- Will there be a contracted bus available?
  - O What assurance is there that the bus services are reliable?
- Are public transportation systems reliable and safe?
- Does ride share available and reliable in a particular country?
- Is the size of the group cost prohibitive should a larger bus/van be needed?
- What are the licensure and insurance requirements?
- Are vehicles maintained and inspected?
- Are the drivers experienced and professional?
- Are replacement vehicles available?
- Will the driver stay overnight or return in the morning for a pickup?
- Will the number of travelers change the category of vehicle?
- Can vehicles be rented or driven by participants? AU does not permit participants to operate vehicles or rent vehicles overseas.

#### **Housing**

Housing considerations are also a major concern to be addressed. Our duty of care requires that we provide adequate housing for our travelers. Questions to ask include:

- Where will the group stay- Hotel, hostel, home stay, university residence hall, conference facility, rental apartments, or other accommodation?
  - O How are roommates or host families selected?
  - Are deposits required? If so, what is the form of payment?
  - What are the sleeping arrangements? It is optimum from a risk mitigation/personal security perspective for each traveler to have a single, securable room. If that is not possible, at a minimum, all AU travelers are required to have their own bed if rooms are shared.

- Thoughtful deliberation on housing arrangements is required if sharing of a room is a necessity to alleviate any perceived insensitivity issues or potential violations of Title IX regulations or University policies.
- Can a third-party partner arrange housing?

#### Meals

Consideration regarding meals is extremely important.

- Are meals provided as part of the accommodation?
- Are individuals expected to obtain food on their own or is it provided in a group meal?
- Is there a meal allowance or will reimburse be available?
- Are there special dietary requirements?
- Does the budget support the cost coverage for meals?
- Will a third-party host handle this for a fixed fee?
- What supervisory controls are in place should travelers be able to individually obtain food at local establishments requiring individual, independent travel?

#### **Classroom and Office Space Needs**

- Will classroom space be needed? If so, how often and for how long?
- Will the accommodation have a usable meeting space?
- Is there a specific cost for renting space?
- Have you budgeted for this?
- Will the group leader need office equipment for any reason?
- Is this part of any fee that a third-party partner will cover?

#### **Excursions**

Excursions will also need to be considered.

- What relevant academic, professional, or cultural sites are to be visited?
- Will there be a guided tour or lectures?
- Will local contacts be able to arrange, or will the leader be arranging?
- Is there mandatory group participation or is it optional? Consider should be made for individuals' abilities to physically participate in mandatory activities that involve physical activity.
- Is cost included in the program fee or has this been budgeted for?
- What role does a third-party partner play, if any?
- Planners must employ the same level of thought to risk mitigation for excursions. Specifically, it is important to ensure that relevant safety considerations are applied to excursions. These include mode and condition of transportation requirements. For example, is the hired transport company insured, certified, inspected to government standards? Is the driver licensed and experienced? If the excursion involves watercraft or swimming, have you coordinated with the Office of Global Safety. Are bicycle tours or hiking excursions planned? If so, coordinate during planning with the Office of Global Safety.

#### **Passports and Visas**

 All participants must have passports, so it is important that applications for passports be submitted in a timely manner. There can be significant delays and costs associated with obtaining a US Passport. If travelers are citizens of other countries, they need to contact their home country for passport data early on in the process.

- Are visas required? You must advise the students how to obtain a visa for a particular country visit.
- US citizens should register with the Department of State Smart Traveler Enrollment Program (STEP).

#### **Finances**

- Once the trip is approved, the faculty/staff leader must coordinate payments with the appropriate university office. Additionally, if refunds are due to a student because of cancelation, any un-refundable fees should be discussed prior to application submission.
- Contingency fees may be applicable as well. Given that emergency situations such as labor strikes, medical issues, and the like can occur at any time, a 5 to 10% contingency fee can be considered. Monies accepted would be refundable if the fees were not used. The use of thirdparty contacts typically eliminates the need for contingency fees.
- Receipts are required to document expenses incurred while abroad and should be submitted according to policy.

#### **MOAs and Contracts**

Depending on the specifics, the faculty/staff leader should rely on signed MOAs to the extent possible to provide guidance and services based on specific agreements. Any contracts should be processed through the school's financial officer and/or Procurement and Contracts for validation.

#### **Accompanying Family Members**

Faculty/staff leaders on short-term AU Study Abroad programs wear many hats including professor, chaperone, academic advisor, counselor, money manager, safety officer, and tour guide. The workload and responsibilities for programs abroad is thus much higher than that of teaching a similar course on the American University campus.

Accordingly, faculty/staff are strongly discouraged from having non-participants accompany them abroad during the time the program is in session. Often such an arrangement works best when family members join the faculty or staff members at the conclusion of the program. Faculty/staff are reminded that their priority is that they are available to their students in any potential emergency (or perceived emergency) 24 hours a day, 7 days a week for the duration of the program.

For these reasons, faculty/staff spouses (or recognized domestic partners) will be required to execute a Consent and Release Agreement. The University reserves the right to deny family members permission to accompany faculty/staff while the program is in session. It should be noted that non-affiliated travelers do not possess any travel assistance program coverage. It should also be noted that minor children are prohibited from traveling with an approved group unless a full-time caregiver is present for the minor child.

#### Vendors

Faculty should identify preferred vendors (hotels, transport companies, travel agencies etc.) as soon as possible, preferably in their program proposal and in their initial meeting with the school's administrators.

All vendors must comply with AU financial operations which may include entering a Professional Services Agreement (PSA/PSA-C), Memorandum of Agreement (MOA), completing U.S. tax forms and other paperwork that tracks what funding is changing hands (see next section).

#### **Vendors/Paperwork**

Faculty will work with their school's financial staff to determine what vendors/ third-party providers/ partner institutions will be utilized to run the program. In some cases, an MOA will be required for partnering with one of these types of organizations to operate the program. In most cases, particularly when not working with a higher education institution, the program will require a PSA and/or PSA-C (Professional Services Agreement for an Individual or a Professional Services Agreement for Corporations) that will be reviewed by the program staff and signed by the AU Procurement and Contracts Division. These are standard contracts that will allow for a section (the Statement of Work) to be written with specific details about what is being agreed upon, what services are being provided, what funding is changing hands, etc.

Program staff will work with the faculty members to determine which of these documents are required. However, the faculty member will be expected to support the completion and processing of these documents when deemed necessary and when their own direct connections with the partner are a factor.

These forms should be addressed at the start of working with a partner organization and should be finalized no later than one month prior to the start of the program.

A formal invoice from the organization must also accompany or follow these agreements to initiate a payment to the partner. The invoice should include an itemization of the services being provided as well as wire transfer details (which can be part of a separate document). All invoices should be paid no later than one month prior to the start of the program.

A <u>Vendor Application</u> and W8-BEN-E form are also required for any new partner organization (higher ed. institution or vendor) if AU has not previously worked with them.

#### • Foreign National Payment Packet

- Service Provider Form
- Statement for Service Performed Outside of the U.S.
- W8-BEN (foreign national) or W8-BEN-E (foreign org)

#### Final Program Planning & Delegation of Responsibility

Once the program proposal is approved, the faculty leader will work with the program staff to schedule a meeting to discuss the planning and implementation of the program. By agreeing to direct a program abroad faculty can enjoy many of the benefits of overseas travel, but along with these are responsibilities that are not usually a part of teaching duties on campus.

# Section 6 General Risk Mitigation Steps

Faculty/staff leaders and logistics coordinators should follow these steps to prepare ahead of time for possible emergencies:

- 1. Acquaint themselves thoroughly with region-specific health and safety concerns.
- 2. Prepare themselves and program participants for a safe program, both physically and emotionally, by urging participants to consult with all of their health care providers prior to departure, including the mental health professionals should a traveler be under the care of a mental health professional. A care plan should be provided for students needing continued care while traveling. Sufficient amounts of medication (in original prescription bottle) should be procured prior to travel. Additionally, care should be taken to ensure drugs/medications legal in the USA are legal to be possessed in destination country.
- 3. Discuss the Student Conduct Code with program participants. Discuss expectations in class or at a pre-departure meeting.
- 4. Conduct pre-departure orientations covering region-specific health and safety precautions and procedures.
- 5. Distribute Emergency Card with insurance information and faculty/staff leader cell phone numbers to all students. Provide the list of Office of Global Safety phone numbers as well as AUPD numbers to use in case of an emergency.
- 6. Conduct an on-site orientation that acquaints participants with in-country medical procedures/facilities, reinforces emergency protocols, and revisits the Student Conduct Code.
- 7. Be prepared 24-7 to respond to the needs of the program participants while traveling.
- 8. Carry a notebook with program and student information and a cell phone at all times and be prepared to communicate via phone or e-mail with AUPD and campus administrators in the event of an emergency (after working with on-site colleagues).
- 9. Be familiar with the College's insurance website, AXA, and coordinating international coverage through the Office of Global Safety.
- 10. Know how to contact your in-country partner program's director(s) for any situations that you worry could become emergent such as a student's mental health deterioration, sexual assault, regional safety issues, etc.
- 11. Know how to communicate swiftly with AUPD 202-885-3636 for guidance and assistance whenever a situation arises that you may not have the expertise to handle.

# Section 7 Office of Global Safety Approach to Risk Mitigation and Trip Approval Requirements

International travel is an integral part of the American University (AU) educational experience and mission. Due to the unique nature of international travel and the destinations that AU faculty, staff and students visit, the Office of Global Safety (OGS) assesses risk so that informed decisions can be made when planning and approving international travel.

The Office of Global Safety provides intelligence-based recommendations related to risk mitigation for various study abroad programming conducted by various schools within AU. This office also reviews memoranda of understanding and contractual agreements from a health and safety perspective as well as conducts periodic site visits to review security protocols.

For individual or group, non-study abroad, international travel requests, whether they are initiated by faculty, staff, or students, the established travel approval process provides university travel approvers with the requisite information needed to make timely, informed decisions related to international travel requests. Typically, at least two weeks is required to process these types of travel requests. However, group travel, and more specifically, faculty/staff-led travel can take many weeks or months to review based on the destination choices made by requesters. It is imperative that the collaborative planning process with the Office of Global Safety begins early in the process so this office can provide the administrative approvers sufficient time and information to make an informed decision. Concepts for courses should be presented to the internal department approvers 12 to 18 months before the proposed travel.

# Section 8 Global Safety Risk Assessments

The best way to mitigate and prevent issues from arising during travel is to do a line-item review of the itinerary with the faculty leader well in advance of the travel. This establishes the baselines in which the group will operate while traveling, enables the Office of Global Safety to discuss higher risk issues prior to contracts or agreements being signed. This is the most efficient way to mitigate potential problem areas.

Additionally, this office assesses, and reviews requested destinations relying on several factors including (but not limited to):

- Review of Department of State and Overseas Security Advisory Council assessments
- CDC warnings and advisories
- Horizon Crisis24/ (formerly WorldAware) assessments
- Insurance provider's known assessments
- Current events
- Information from program managers
- Known AU or other university information regarding destination or travel program
- Experience levels of travelers

#### Risk mitigation is accomplished by:

- Providing and discussing risk assessments and developing strategies to lower risk
- Providing and supporting organization pre-travel briefings
- Advising on personal security issues
- Administering the AU Enterprise Travel Registry (ETR) and travel approval documents
- Coordinating the AU response during critical incidents abroad
- On-going intelligence monitoring
- Liaising with private and government entities including the U.S. Department of State, intelligence providers, regional partners, and partners in higher education
- Conducting site visits to improve security onsite abroad
- Coordinating international emergency insurance coverage
- Membership in the Study Abroad Working Group
- Facilitating communication with travelers and groups
- Providing coordination and reporting of incidents occurring during constituent travel
- Collaborating with program managers to ensure MOAs meet safety and risk best practices

#### Mitigation Step: Registering for the AlertTraveler App

AlertTraveler is a mobile application (available on Android and Apple devices) that allows for two-way communication between the traveler and American University, provides travelers with up-to-date country intelligence to prepare them for travel, quick-dial emergency services numbers for the traveler's location, among other features. This App provides a method to conduct check-ins during a crisis. The application is free and available for students, faculty, and staff traveling abroad.

• <u>AU Study Abroad travelers</u> will register for AlertTraveler within the Study Abroad application process.

- <u>WCL individual faculty, staff and student travelers</u> will register for AlertTraveler App in the Global Safety Enterprise Travel Registry upon approval of the trip.
- <u>WCL group travelers</u> register their travel in WCL's Terra Dotta system. The link for registering for AlertTraveler is available within the Terra Dotta system.
- <u>All other faculty, staff, and student travelers</u> will register for AlertTraveler App in the Enterprise Travel Registry upon approval of the trip.

## **Section 9** Pre-Departure Orientation Sessions

Well in advance of travel, the faculty/staff leader should hold at least two meetings with students to prepare them for the program abroad. One of these meetings should be a formal Pre-Departure Orientation Session (PDO). (It should be noted that some schools' programming offices may provide a specific safety PDO according to their particular protocols while faculty and staff provide for a PDO related to academic content. Please coordinate with your school's programming office to determine specific responsibilities.)

With the safety of our students abroad as a top priority, the program operates academically challenging programs where students learn from close integration with their host cultures. AU only administers programs that we deem safe.

The program performs a risk-assessment evaluation for each new program and performs regular risk-assessment reviews all continuing programs. However, even with the care which our staff members give to our students' safety, and even if students carefully follow all the guidelines provided, a completely safe environment cannot be guaranteed abroad, just as no one can guarantee it here in the United States. Although study overseas is generally no more dangerous than study in the US, there are some risks that are unique to studying abroad and whenever incidents do occur the impact on participants and their families can feel more profound because of the unfamiliarity of the context and the distance that separates participants from their primary personal sources of support.

Therefore prior to leaving the US, a safety briefing is part of the mandatory pre-departure orientation given to students. Once on site, if necessary, local partners may provide an additional orientation. While on-site students are given 24-hour emergency contact numbers and are informed of emergency procedures. They are asked to provide on-site staff with itineraries and contact information whenever they may travel independently of the program in their free time. During a program, the faculty/staff leader will modify or cancel planned field trips or other activities whenever necessary to ensure student safety. The faculty/staff leader must stay in regular communication with site Directors and Coordinators regarding the situation at each program site.

AU provides emergency travel assistance coverage which includes accident/sickness coverage and travel assistance to all students, faculty and staff travelling on AU business or with AU programs. This is not optional and incurs no cost to the student or faculty member. Faculty leaders, students and their parents are encouraged to become familiar with the AU Plan's benefits and features, which may be found on the AU Global Safety webpage. Faculty will also have access to the emergency contact information for each student in a packet prepared by the faculty/staff leader prior to departure.

Certain behaviors and high-risk activities cannot be condoned or implicitly supported by AU because they carry potential unacceptable risk to both the individual and the university. Such activities include, but are not limited to:

- Participating in or attending political demonstrations
- Bungee jumping
- Scuba diving
- Certain water-based activities
- Renting and operating motor vehicles of any kind

Use of illicit drugs are prohibited, and use of alcohol (if of the local drinking age) must be outside
of academic hours and must not impact the academic mission of the program

Participants need to be alerted to the dangers of such activities during orientation and as necessary throughout the program. Because neither the university nor the faculty director can control the actions of any individual, faculty/staff leaders must require students who they know intend to engage in any risky activities to sign a statement to the effect that they are doing so outside the auspices of American University. The signed statement thus documents that the student was fully informed of the potential risks of his/her behavior.

In most locations outside the USA, it is legal for adults ages eighteen or over to partake in alcoholic beverages. US students travelling abroad may be tempted to misuse alcohol under these circumstances. Because over-indulgence in alcohol can lead to a lack of judgment and awareness, students who misuse alcohol also place themselves and their companions at greater risk of encountering accidents and street crime. In addition, alcohol abuse is the primary source of behavioral conflicts between group members.

Faculty leaders should address any concerns about alcohol misuse and abuse up front prior to travel. While the laws in the host country may allow for legal consumption of alcohol, participants must be reminded that alcohol abuse will not be tolerated while engaged in AU Study Abroad programs. Violations of local laws may result in immediate dismissal from the program with failing grades and no refunds. In addition, irresponsible use of alcohol that results in behavior that is damaging to the student, to others, or to the reputation of the program and to AU may also result in immediate dismissal from the program. In addition, students are subject to Student Conduct Code violations for their conduct. Responsible use of alcohol is necessary on the part of every program participant including the faculty leader.

Responsible use of alcohol includes the following:

- Adherence to local laws
- Adherence to local customs
- Not missing scheduled events due to the effects of alcohol
- Not becoming ill due to the effects of alcohol
- Not engaging in inappropriate behavior towards others due to the effects of alcohol
- Not becoming destructive of property due to the effects of alcohol
- Being respectful of those sharing the same housing and not congregating in loud groups
- Not engaging in behavior that causes embarrassment to the group and to the on-site hosts due to the effects of alcohol
- Not facilitating, encouraging, or ignoring a fellow participant who abuses alcohol
- Transporting quantities of alcohol to program sites with the intent of sharing it with other members of the group is considered to be irresponsible
- Avoiding any conduct that could violate or be construed as a violation of Title IX regulations

#### **Traveler Safety**

American University emphasizes to students and to their designated emergency contacts/family that all program participants must take responsibility for their own safety, security, and well-being. This information is highlighted during pre-departure preparations, on-site orientations, and throughout the program. While on a faculty/staff-led program, the AU expects all participants to take precautions with their health and safety and to make smart decisions at all times. We caution students to use common sense, be alert and aware of their surroundings at all times, travel with a friend, and to never put themselves in compromising positions with the use of drugs or alcohol.

Faculty/staff leaders have significant responsibilities should emergencies arise. American University considers an emergency to be any circumstance that poses a genuine risk to, or that has already disturbed, the safety and well-being of program participants. Emergencies may include incidents that are "newsworthy" and reach U.S. news agencies, causing alarm to parents or colleagues. Emergencies may include, though not be limited to, the following types of events and incidents:

- Physical assault
- Disappearance, hostage-taking, or kidnapping of a student
- Robbery
- Sexual assault or rape
- Serious illness, physical or emotional
- Threat of, or attempted, suicide
- Significant accident and/or injury
- Hospitalization for any reason or length of time
- Terrorist threat or attack
- Local political, natural, or human-caused crisis/disaster in the vicinity of student accommodations or classrooms
- Arrest or questioning by the police or other security forces
- Any legal action (lawsuit, deposition, trial, etc.) involving a student
- Death of a student

#### **Passport and Visa Issues**

Students need ample time to apply for their passport, so it is important to include this in your early communication with interested students. Depending on the program, students may need to obtain visas to travel. The faculty/staff leader can help students navigate through the visa process. Please keep in mind that international students may need visas for countries where US students do not, and time should be allotted for such situations.

#### **Code of Conduct**

Traveling with a group in a foreign country whether earning academic credit can be challenging. One of the best ways to ensure that everyone participating in a faculty/staff-led program has as good an experience as possible is for the group to agree upon a set of behavioral guidelines. These guidelines set the stage for each member to assume responsibility for his or her behavior within the context of the group's expectations.

#### **Cultural Sensitivity and Country Specific Information**

As soon as the course and/or non-credit travel abroad has been approved, the faculty/staff leader should begin to develop orientation materials to acquaint students with the customs and mores of the countries they will visit. If the leader is not familiar with the native language, we strongly suggest enlisting the assistance of someone on campus or in the community who is. They can share their experiences with you or attend a pre-departure meeting to share language basics.

#### **Billing**

Each pre-departure meeting should address billing questions as well as remind students of upcoming payment deadlines.

#### **Student Orientation On-Site**

If you are working with a Third-Party Partner, the contract should require the Provider to give a general orientation upon arrival in-country. Any in-country orientation should include:

- What to do in an emergency (medical, political, or natural disaster).
- Local orientation (such as where the nearest hospital is, how to get to the subway, ATM, grocery store, etc., as well as safe/unsafe areas of the host region).
- How to contact the resident director or guide as well as the faculty/staff leader.

**Note:** This information should be always carried by students on an Emergency Card, and they should be encouraged to enter the information into their phones.

An orientation to the hotel rooms, homestay, or apartments (quiet hours, keys & locks, etc.). If a
third-party partner is not involved in the program, the faculty/staff leader will be solely
responsible for this orientation.

#### **Emergency Preparedness**

Students should understand what role they play in an emergency. Please see the section on "Guidelines for Health and Safety" and "Handling Emergency Situations" for greater detail. At the end of orientation students should understand what to do in a medical emergency, a political emergency, and a natural disaster. Students also should understand what would happen if the faculty/staff leaders were to become incapacitated and what the day-to-day expectations are of the students. Faculty/staff leaders should set up and instruct the group in how to access each other within a messaging app such as WhatsApp.

#### **Hotel Address and Telephone Number**

If the faculty/staff-led program is changing locations on a regular basis, students always should carry a business card with the hotel address and telephone number, as well as the faculty/staff leader's cell phone number, in case they become separated from the group. Please remind students daily to carry this information. This card includes emergency support numbers from AXA, embassy information, and cell phone information for faculty leaders.

#### **Establishing Expectations**

Although the faculty/staff leader should cover student conduct expectations in detail prior to the program's departure, it is good to remind students regularly about these expectations. In the excitement of traveling to a new country, students quickly may forget about their responsibility to the group and to the course. Having a regular check-in meeting, either before the day begins or at the end of the day, is helpful to focus students on their individual responsibilities and their purpose for studying abroad.

### Section 10 Travel Assistance Provider Information

In the event of an emergency call AXA/Chubb's Travel Assistance Services immediately

- 24-Hour Access
- 1-855-327-1414 Toll-Free
- 1-630-694-9764 Direct Dial

# When you call AXA/Chubb's Travel Assistance Services, please be prepared with the following information:

- 1) Name of caller, phone no., fax no., relationship to the Covered Person.
- 2) Covered Person's name, age, sex, and policy number.
- 3) A description of the Covered Person's condition.
- 4) Name, location, and telephone number of hospital.
- 5) Name and telephone numbers for the treating doctor. where and when the doctor can be reached.
- 6) Health insurance information, worker's compensation, or automobile insurance information if the Covered Person had an accident.

**Note:** "Covered Person" means the person insured under the applicable Chubb policy.

#### **Additional Travel Services**

In addition to the insurance protection provided by your insurance plan, Chubb Accident & Health has arranged with our Assistance Provider to provide you with access to its travel assistance services around the world.

#### These services include:

- Medical Assistance includes referrals to a doctor or medical specialist, medical monitoring when
  you are hospitalized, emergency medical evacuation to an adequate facility, medically necessary
  repatriation and return of mortal remains.
- Personal Assistance including pre-trip medical referral information and while you are on a trip: emergency medication, embassy and consular information, lost document assistance, emergency message transmission, emergency cash advance, emergency referral to a lawyer, translator, or interpreter access, verify medical benefits and assists with medical claims process.
- Travel Assistance including emergency travel arrangements, arrangements for the return of your traveling companion or dependents and vehicle return.
- Security Assistance including a crisis hotline and on the ground security assistance to help address safety concerns or to secure immediate assistance while traveling as well as access to a secure, web-based system for tracking global threats and health or location-based risk intelligence.
- This information provides you with a brief outline of the services available to you.
- These services are not insured benefits. Reimbursement for any service expenses is limited to the terms and conditions of the policy under which you are insured.
- You may be required to pay for services not covered. A third-party vendor may provide services to you.

- Our Assistance Provider makes every effort to refer you to appropriate medical and other service providers. It is not responsible for the quality or results of service provided by independent providers.
- In all cases, the medical provider, facility, legal counsel, or other professional service provider suggested by Chubb's Assistance Provider are not employees or agents of our Assistance Provider and the choice of provider is yours alone.
- Chubb's Assistance Provider assumes no liability for the services provided to you under this arrangement, nor is it liable for any negligence or other wrongful acts or omissions of any of the legal or health care professionals providing services to you.
- Travel assistance services are not available if your coverage under the policy is not in effect.
  Chubb NA is the U.S.-based operating division of the Chubb Group of Companies, headed by
  Chubb Ltd. (NYSE:CB) Insurance products and services are provided by Chubb Insurance
  underwriting companies and not by the parent company itself.

#### For medical referrals, evacuation, repatriation, or other services call:

#### **Travel Assistance Program**

- 1-855-327-1414 (Toll-Free)
- 1-630-694-9764 (Direct Dial)
- medassist-usa@axa-assistance.us
- Visit www.acetravelassistance.net for access to global threat assessments and location-based intelligence.

#### **ACCOUNT AND ACCESS INFORMATION**

Username: medassist-usa@axa-assistance.us
Password: acea&h
TRAVEL ASSISTANCE PROGRAM
Organization: American University
Policy Number: GLM N00173587R
Assistance Provider: AXA Assistance USA, Inc.

AXA provides emergency medical and travel services and pre-trip information services. Please call when:

- You require a referral to a hospital or doctor
- You are hospitalized
- You need to be evacuated or repatriated
- You need to guarantee payment for medical expenses
- You experience local communication problems
- Your safety is threatened by the sudden occurrence of a political or military event

#### Section 11 Mental Health Resources

- **In an emergency**, you can contact the AU Police Department (x3636), call 911, or go to the nearest emergency room.
- Any time of day or night, from anywhere you are located, a student may also call 202-885-7979 (AU ProtoCall Services) to speak to an on-call crisis clinician. Parents, faculty, and staff may also call AU ProtoCall services if concerned about a student.
- What is an Urgent Concern?

  That is something that each client defines for themselves. If you have an urgent need to talk with a clinician, our Protocall Services are available 24 hours a day and can be accessed from any location at 202-885-7979.
- If this is a crisis, please see information on hospitals, hotlines, and other resources for help in a crisis.

# Section 12 Faculty/Staff Leader Responsibilities with Regard to Health and Safety

#### American University Guidelines for Health and Safety

The Office of Global Safety places utmost importance on the safety, security, and well-being of program participants. With this in mind, the faculty/staff leader must follow prudent measures to verify that transportation, lodging, and medical facilities are safe and of reasonable quality, and that communication plans and emergency responses are in place to provide a safe environment for program participants.

When designing and implementing faculty-led programs, leaders are tasked with many of the decisions and actions that usually fall upon college administrators when on campus. These responsibilities, however, are impacted by the complexities of international settings, as well as the complex relationships between AU, its representatives, and third-party program providers and hosts, both U.S. and international. All of these entities must work together effectively and ethically, as our decisions and actions will impact how safe the program is and what liability AU incurs in operating the program. It is important to recognize that a bad or unethical decision on our part not only could damage AU's reputation, but also could expose us to personal risk and liability. For these reasons, below are the best practices with respect to all aspects of faculty-led program design and implementation.

It is the responsibility of the faculty/staff leader to:

- Be aware of how to access medical facilities in the country(ies) in which the program is conducted.
- Act appropriately to ensure that medical facilities are available during program excursions should a medical emergency arise.
- Acquaint students with health care practices and facilities in the host country during predeparture orientation as well as during on-site orientation.
- Provide students with the local emergency services telephone number(s) equivalent to 9-1-1 in the United States.
- When possible, provide students with the name and telephone number of a reputable rape crisis center, or of an individual trained to respond effectively to a crisis involving a sexual assault or rape. Use local partner contacts to assist with this.
- Explain to the students the need for them to notify the faculty/staff leader, Third-Party partner, or Host University of any medical emergency, and that the faculty/staff leader, in turn, is required to contact American University as soon as possible to inform us of the emergency. Make sure that the students know that this information will be treated with the strictest confidentiality.
- If a program participant must go to the hospital or doctor, assist in scheduling the appointment, accompany the student to his/her appointment, and assist in any other way necessary.
- On programs in which the services of a Third-Party partner or Host University are utilized, the faculty/staff director should seek their assistance if a student falls ill or a medical emergency arises. The faculty/staff leader can also contact AUPD at +1-885-3636.

#### **Communications**

Throughout the study program the health and safety of the students must be the faculty/staff leader's top priority. They must provide the students with his/her cell phone number(s) and instruct the students

to call at any time, day, or night, for assistance in the event of an emergency. Student participants may give the leader's phone number to their emergency contacts—to be used only in the event of an emergency.

Prior to departure the faculty/staff leader and program participants will create a Code of Conduct that outlines the importance of making wise decisions to protect one's health and safety and rules that will allow the program to run successfully. American University will support the decision made by a faculty/staff leader to expel a student who chooses to disregard or violates the established Code of Conduct. No program costs will be provided to a student who is expelled from a program. In addition, a student expelled from a program will be responsible for all costs associated with leaving the program early. These facts should be clearly stated in the Code of Conduct.

The faculty/staff leader(s) must provide students with an on-site orientation that provides useful information on acclimating to the host culture as well as instructions on making local phone calls, contacting the police, and visiting the doctor. The leader and/or Third-Party Program Provider or Host University also must provide instructions regarding the protocol to follow in the rare event of a political crisis, terrorist event, natural disaster, or other emergency. Similar written instructions should be included in the student's pre-departure orientation Guidebook.

The faculty/staff leader should instruct all participants to follow these general recommendations relating to program safety:

- It is recommended that unless specific situations dictate otherwise, participants should designate their parents as emergency contact persons.
- Participants and their emergency contacts should communicate regularly throughout the participants' time out of the United States.
- Participants should notify the leader immediately in the event of any emergency, accident, serious health problem, serious mishap, or health condition lasting longer than a day or two.
   They then should notify their emergency contacts.
- Participants are instructed, in the event of an emergency when the group is separated, to return
  to their residence/accommodations and await contact from the faculty/staff leader's and/or
  Third-Party Provider or Host University.
- Participants are discouraged from congregating in large groups of Americans and from spending time in restaurants and bars that are known to be frequented primarily by Americans.
- Participants are discouraged from congregating in large groups or participating in any type of demonstration.
- Participants are prohibited from renting any form of motorized transportation during the program.
- Participants are prohibited from taking illegal drugs or consuming alcohol during the program.
- The students' endorsement form authorizes American University to communicate any relevant information to the participants' emergency contacts in the event of an emergency.
- Participants and their families need to be aware of the fact that the U.S. Department of State
  Office of American Citizens Services and Crisis Management will not release information about
  specific individuals to American University or to other third parties.
- The U.S. State Department web site indicates that families in the United States whose U.S. citizen relatives are abroad and are directly affected by a crisis can communicate with the Department of State through its Office of American Citizens Services and Crisis Management 407-4747 or 202-647-5225 (after hours). More information can be found here

https://travel.state.gov/content/passports/en/emergencies/crisis-ways-to-locate-your-lovedones.html

#### **Duration of the Program**

Program materials will clearly state the last date of the program. After that date, American University and the faculty/staff leader no longer bear any responsibility to or for the student, and students are free to travel independently. American University's Travel Assistance provider does continue to cover the student in the event that they travel abroad independently before or after the end of the program for seven (7) days (exclusions apply). The faculty/staff leader will encourage all students to remain in frequent contact with their family and emergency contacts while traveling abroad.

### Section 13 Guidelines for Health & Wellness

#### **Immunizations**

When immunizations are required for a particular destination, participants may need to visit a travel clinic well in advance of program departure. Remember that a typical physical examination may not include information about immunizations. Your health care provider may not have access to certain vaccines specific to travel. A visit to a travel clinic may be necessary to attain proper immunizations. The.

#### Region-Specific Health Issues Health Insurance Coverage

Faculty/staff leaders should familiarize themselves with region-specific health issues in the host country. Issues of concern may include avian flu, cholera, diarrhea, diphtheria/tetanus, Hepatitis A, Hepatitis B, HIV/AIDS, Japanese encephalitis, malaria, polio, rabies, SARS, typhoid, tuberculosis, or yellow fever. Even if you have traveled to your destination previously, be aware that prevailing conditions change rapidly. Notices, precautions, and warnings of region-specific health issues are routinely updated on the following Web sites:

U.S. Center for Disease Control: www.cdc.gov/travel

World Health Organization: www.who.int

Travel Health Online: www.tripprep.com (free, but you will need to create an account)

All participants, including the faculty member(s), need to prepare for their physical and mental health during an international experience. This should include consulting with health care providers: for example, a physician, gynecologist, optometrist, counselor, dentist, and an International Travel Clinic. Each traveler will be provided with an Emergency Information Card with insurance phone numbers, group ID number and brief instructions for managing an emergency. The card also includes space for students to write in their site director's cell phone number, accommodations information, embassy information and local equivalent to 911.

It is highly recommended that you have a credit card available just in case a medical facility will not provide treatment without total payment.

#### **Medical Facilities**

Medical treatment varies throughout the world due to cultural differences as well as medical training, supplies, and facilities. Faculty/staff leaders should familiarize themselves with health care practices in the country they will visit and acquaint students with these practices. For country-specific information on medical facilities, emergency services, etc., a useful resource is www.tripprep.com. In addition, faculty/staff leaders can contact the U.S. embassy or consulate and obtain from the health care officer the names and contact information for doctors they recommend. Obtaining this information *prior* to an emergency as a matter of routine trip preparation will save the leader valuable time in the event of an emergency.

#### <u>Student Medical/Psychological Condition Self-Disclosure</u>

All students participating in an American University faculty/staff-led program complete a self-disclosure section in the application. While the information disclosed cannot preclude the student from participating, as long as stated educational objectives can be met, the faculty/staff leader should review it and confer with the program director to determine if a disclosed health issue should be discussed with a student in advance.

#### **First Aid Kit**

The most common health problems that travelers encounter are traveler's diarrhea, upper respiratory infections, and skin conditions. Faculty Directors should encourage all program participants to travel with a small first aid kit appropriate for the destination and length of stay of their trip. (*Note: Unless the faculty/staff leader is a physician, students should determine, on their own, what medications to take in their kits and how to administer these medications to themselves.*) The leader should never dispense medical advice or medication to students.

#### **Prescription Medications**

Faculty/staff leaders should talk with participants about planning for what prescription medications they will need while abroad. Leaders should be aware of students who require regular meals with their medication. If participants are on medication they should:

- Check with the destination embassy to ensure a medication is legal to possess in-country.
- Bring enough of the medication for the duration of the program.
- Carry all medication in the original container.
- Fly with medications in carry-on luggage.
- Keep medications in a place where they cannot be lost or stolen easily.
- Carry an up-to-date prescription for each medication that states the drug's generic name (medications may be referred to by different names in foreign countries), instructions, dosage, and reason for prescribing the drug.
- Check with their physician for advice on how to adjust dosages when changing time zones.

#### **Medic Alert**

Participants with serious conditions (e.g., allergies, diabetes, epilepsy) should inform the leader prior to travel of their condition and wear a Medic Alert emblem. Emergency medication that could be required, such as an EpiPen, should be carried at all times.

#### **Emergency Surgery**

Because HIV and Hepatitis B can be spread through contaminated needles and blood, medical evacuation should be carefully considered if a student requires surgery. In this case the leader should confer with the Travel Assistance Provider, AXA, and make every effort to put the student directly in contact with his/her emergency contact(s) and his/her U.S. health care provider. It is ideal if the student's family, AXA, and U.S. health care provider can discuss the situation directly with medical personnel in the host country to determine a treatment plan. The faculty/staff leader should not, under any circumstances, give medical advice. If approved through AXA, a parent or other family member can travel to be with the student who is ill or requiring surgery.

NOTE: \* It is crucial for family members to communicate with AXA and receive authorization booking any emergency air travel in order to have this coverage.\*

# Section 14 Guidelines for Safety

#### Lodging

Student housing accommodations are to be located in areas deemed safe based on pre-travel conversations between the Office of Global Safety, the faculty/staff leader, and/or Third-Party partner or Host University. The same attentiveness must be paid to lodging utilized during program excursions. Hotels or hostels are to be selected based on their proximity to the sites to be visited as well as the security of the area in which the accommodations are located. To the extent possible, the trip leader should utilize hotels/hostels with interior rather than exterior-entry doors. These safety considerations should take precedence over the cost of accommodation.

#### Transportation

Transportation (bus, rail, or plane) deemed to be the safest and most reliable transportation in the opinion of the faculty/staff leader and/or Third-Party Provider or Host University, in consultation with the Office of Global Safety, should be utilized for AU-sponsored travel. Bus companies are to be selected based on their prior safety records, insurance coverage, and, as appropriate, a well-established relationship with the Third-Party Provider. In selecting transportation, the leader might consider recommendations from other universities offering similar programs, the administrative responsiveness of the transportation company, the availability of service and support, and the cost of the services. Again, safety considerations should take precedence over the cost of transportation. A reliable resource for road safety is the Association for Safe International Road Travel, <a href="http://www.asirt.org">http://www.asirt.org</a>, with information available such as road reports for more than 150 countries. Reputable Third-Party Providers have knowledgeable staff who can manage all transportation needs, and AU encourages these partnerships to help ensure student safety.

Whenever possible, travel should occur during daylight hours, as it is safer.

#### **Cultural and Academic Excursions**

Any planned excursion should be essentially tied to the program. As attractive as it may be to gain student participants and make the trip more attractive for participation, sight-seeing and recreational activities that are not essentially tied to the program of study are identified as social and recreational activities. These activities can present excessive risk and are not value-added to the program.

Cultural and academic excursions should be selected and organized so that all participants can participate, and they are essential to the program. For example, physical limitations might prevent a program participant from hiking a trail as part of a faculty-led program. In such instances, the faculty/staff leader could not make the climbing of trail a mandatory program activity, though the climb could be arranged as an optional activity if deemed to be non-high risk. In such cases, it would be best to offer an alternative activity for participants unable to make the climb or avoid this activity completely.

Activities that include a boating-element should be carefully considered prior to inclusion in the program. Boating can take many forms, each with a unique risk level. For instance, any activity requiring use of a boat/ship or other seafaring vessel must be an essential element of the program. Small craft, ferries and other smaller type vessels are by their nature dangerous. Assuming the activity is programmatically essential, life vests must be used, and the boat should be certified and inspected. The requirement is for a licensed crew to operate the vessel and the vessel itself be licensed through the

state, inspected regularly, and documentation provided to Risk Management. Requisite insurance levels should be certified and supplied to Risk Management as well.

**NOTE:** If the faculty-led program requires that participants be physically fit and able to perform certain physical activities, this must be outlined in marketing materials and clearly stated in the program's application. Contact the Office of General Counsel and the Office of Global Safety for advice and assistance. If you have any questions regarding the need to accommodate a student with a disability, contact the Academic Support and Access Center for consultation as soon as that becomes apparent. See below for comments on disabled students studying abroad. Specific waivers may be required for certain activities. **It should be noted that "program-scheduled activities" can create additional liability and duty of care responsibilities.** 

#### **Study Abroad for Students with Disabilities**

Though in most cases not required for their academic program, study abroad is a valuable learning experience for all students, including students with disabilities. At American University, students with disabilities and/or medical conditions have been able to access academic support through the Academic Support and Access Center (ASAC). It is important to know that other countries may not offer the same kinds of programmatic and physical access as students may be familiar with in the United States. Of course, American University cannot alter the infrastructure, architecture, transportation, laws, or cultural attitudes of other countries. Great flexibility is required of any traveler, but even more so for travelers with disabilities.

An important learning outcome of studying abroad for anyone with a disability is learning how the host country defines and addresses the needs of persons with disabilities. Such students should expect to answer questions about their needs from those they encounter on their trip -- roommates, professors, host family, or others who may be seeking to understand and be of assistance. We also highly recommend that students ask questions to the designated person(s) at the host institution in advance of their travel.

Any student planning to study abroad should meet early on with an Academic Support and Access Center staff member to discuss the nature of the travel, associated activities, and needs while abroad. Students will need to provide proper documentation of the disability. There must be collaboration between the Academic Support and Access Center, the student, the study abroad program, and the faculty/staff leader to determine what accommodations are required and feasible in connection with a particular program.

Travelers requiring or requesting the assistance of a personal health assistant should coordinate individualized requirements with ASAC and Risk Management.

Faculty may find the below listed national resources for both faculty and students:

- **State Department:** https://travel.state.gov/content/travel/en/international-travel/before-you-go/travelers-with-special-considerations/traveling-with-disabilities.html
- Mobility International: http://www.miusa.org
- Diversity Abroad's Students with Disabilities Abroad:
   https://www.diversityabroad.com/guides/diversity-and-inclusion-abroad-guide/student-with-disabilities-abroad

#### **Risk Mitigation Strategies for LGBTQ Individuals**

It is important to understand that countries sometimes do not view LGBTQ similarly to the United States. Therefore, it is important to plan for mitigation strategies when traveling abroad. Check with Department of State Travel Advisories to determine if a particular destination has regulatory issues related to LGBT issues. Risk mitigation strategies for lesbian, gay, bisexual, transgender, and queer (LGBTQ) individuals include the following advice as provided by HorizonCrisis24:

#### **General Strategies**

- Understand local expressions and words that may indicate a derogatory view of LGBTQ individuals
- Do not accept drinks, cigarettes, or chewing gum from strangers, as reports have shown that some assailants taint these products with drugs.
- Most countries that pose above a moderate threat have very conservative societies, dress, and act in accordance with social norms.
- Note: Visitors to and expatriates living in a country are bound by the laws of that country. An
  individual's home country's government is unable to release an individual from incarceration in
  a foreign country. Home country consulates will be able to give only limited assistance to their
  citizens who are imprisoned. In some countries, the burden of proof rests on the accused, not
  the prosecutor.

#### Moderate, Low, Minimal Risk Levels

- Exercise caution during LGBTQ pride events and festivals, as a precaution.
- If caught in a potentially violent situation, immediately seek shelter in upscale hotels or large public buildings, such as libraries, theaters, hospitals, or museums.

#### **High Risk**

- Be mindful of cultural bias when assessing acceptance. Do not assume to understand
  mannerisms, unless you are familiar with the culture; for example, handholding between men is
  common in many locations and meant as a gesture of friendship, not sexual attraction. Other
  behaviors that may appear to be romantically intimate may in fact be platonic.
- Avoid all LGBTQ pride events and festivals.
- If police or other authorities harass you, immediately contact your diplomatic mission.
- If caught in a potentially violent situation, immediately seek shelter in upscale hotels or large public buildings, such as libraries, theaters, hospitals, or museums.
- Take extreme caution if engaging others in conversations about sexuality or LGBTQ issues. Only
  do so with well-vetted acquaintances in safe locations.
- Do not visit local LGBTQ bars or clubs.

#### **Extreme Risk**

- If asked, avoid discussing sexual orientation and gender identity.
- Do not engage anyone in conversations about sexuality or LGBTQ issues.
- Do not publicly display affection under any circumstances.
- If police or other authorities harass you, immediately contact your diplomatic mission.
- Avoid using the words "gay," "lesbian," "sex," or other sexually related terms while using the
  internet and drafting emails on both public and private devices, as authorities may monitor or
  search devices.
- Do not use the internet or online apps to meet members of the LGBTQ community while in extreme-rated countries, as these kinds of apps are banned in some countries with an extreme threat environment and local nationals may use these platforms to target LGBTQ individuals.

#### Section 15 CLERY Act Considerations

#### Steps to Report a Crime (in Compliance with Clery Act)

- Gather information from the student(s) involved and any witnesses. Be sure not to lead students on and suggest things they may have witnessed see what they recall on their own. Take detailed notes.
- Alert the local authorities, if applicable
  - While you may not always need to contact local authorities, this may also include seeking medical attention depending on the nature of the crime. The student's wellbeing is the first priority.
- Complete the Campus Security Authority Referral form. Email to AUPD Investigations
  - o investigations@American.edu
- **Contact your program office** to notify them of the situation. It is vital that you take detailed notes in order to relay all information accurately. Your contact with AUPD must be timely.
- **AUPD** will collaborate with you to determine the best course of action.

**NOTE:** If the crime is of a gender-based or sexual nature, follow the protocol listed above and additionally, follow the Title IX reporting protocol

## **Section 16 Security Considerations**

AU recognizes the importance of establishing policies and procedures in the effort to protect the safety and well-being of study abroad participants while acknowledging that no single plan can address all contingencies. Listed below are some of the ways AU strives to keep studying abroad as safe as possible:

- The Office of Global Safety monitors safety issues at all program sites on a continual basis.
- All participants must attend the mandatory pre-departure orientation session that stresses safety issues and understanding cultural differences
- Emergency procedures are in place, including medical and general emergency evacuation procedures
- AU provides international travel assistance which includes accident/sickness coverage and emergency assistance plan (including evacuation) to all program participants

Country-specific information will be provided in the program orientation packet. It is the faculty leader's responsibility to be familiar with the <u>US State Department Travel website</u> regarding safety and security updates pertaining to the program destination.

AU approved travelers must adhere to any restrictions on travel that were subject to their travel approval. This includes not traveling to high-risk rated areas or areas specifically prohibited in the approval process. AU program participants traveling to any region or country where the US State Department has issued a warning may be required to sign a waiver. Students should be advised to avoid travel to or through any other location where tensions exist, and travel may be dangerous.

The faculty leaders, and all students must enroll and activate AU's ALERT Traveler application. ALERT Traveler is a mobile application that utilizes GPS and your study abroad program itinerary to provides you with country and city intelligence to help you make informed decisions while traveling, safety and security alerts to let you know of any events that could potentially impact your travel or safety, and an instant check-in option allowing you to report your status back to administrators and travel advisors at your institution in case of an incident. Registration will take place around the time of Pre-Departure Orientation and may take place using the app or through email.

The faculty/staff leader is responsible for communicating applicable codes of conduct and the consequences of non-compliance to the students. In the event there are US State Department public announcements, worldwide cautions or travel warnings while the program is in session, the program, after consulting with the Office of Global Safety will send a notification to the faculty leader. The faculty leader will then relay any applicable information to the students.

Throughout the program, faculty/staff leaders and students should keep up with local news through newspapers, radio, and television. Students should be told to use common sense and caution when divulging information to strangers about themselves, their fellow students, and the program. Faculty leaders must brief students on the desirability of blending in with the local culture including, when possible, speaking the local language in public. This includes advising students to maintain a low profile, avoid crowds and protest groups, and avoid night clubs where Americans, especially US service people, are known to frequent.

Faculty leaders should know the international telephone access code(s) for calling the US from the host site and how to contact the US from the host country.

Transportation creates unique risks while traveling abroad and exposes the travelers to increased risk of injury. The use of automobiles or other motor vehicles driven by faculty should be avoided and prohibited by students. All risks associated with travel in the US are present as well as difficulties involving cars, roads, traffic, and laws, all of which will be governed by regulations and customs different from those in the United States. While these risks might be managed with experience, obtaining valid and effective insurance abroad can be problematic. When travelling on program-related activities, participants should be transported by public transportation or in vehicles contracted for or rented from reputable companies by AU for that purpose and driven by professionally hired drivers who have had their credentials validated prior to the trip.

#### **Dealing with Emergencies**

Faculty leaders may find themselves facing an emergency involving one or more of the students who are in their care, or an emergency of their own. Participants can and do become ill, suffer accidents, are the victims of muggings/thefts/assaults, find themselves caught up in potentially violent situations, fail to return on time to programs after a weekend away, or themselves engage in alleged illegal activities and face detention or arrest by local authorities. While it is impossible to plan specifically for all contingencies, programs must follow procedures that allow for a level-headed response when emergencies do arise. We must provide for the safety and wellbeing of our students, and also take all reasonable and prudent measures to limit AU's legal liabilities.

The program in consultation with the Office of Global Safety is responsible for coordinating the University's management of emergencies affecting participants in all programs abroad. It is the responsibility of the faculty/staff leader of the program to follow the procedures outlined below and to be sure to inform students about these procedures upon arrival on site.

#### What is an Emergency?

For study abroad purposes, an emergency is any circumstance that poses a genuine risk to, or that has already disturbed, the safety and wellbeing of program participants. Emergencies include, though are not limited to, the following:

- Physical assault
- Disappearance or kidnapping
- Robbery
- Sexual assault
- Serious illness, physical or emotional
- Significant accident/injury
- Hospitalization for any reason
- Local political crisis that could affect the program's operations
- Arrests or detention by police or other security forces
- Any legal action
- Terrorist threat or attack

#### **How to Prepare for Emergencies**

The Office of Global Safety requires all program (US Citizen) participants to register with the US State Department, Smart Traveler Enrollment Program (STEP) which serves as the communication point for all

US embassies abroad. Once on site, students should be informed of the exact location of the nearest US Embassy or Consulate (which is also indicated on their emergency contact cards disseminated by the faculty/staff leader).

Health and medical care are important topics to be discussed with students and should be incorporated into the pre-departure orientation and discussed at other points throughout the program. Students should be reminded to notify the faculty/staff leader immediately about any health problems they experience even if these problems appear minor. The need for hospitalization can often be prevented by prompt treatment.

The faculty/staff leader will perform advanced research to compile a list of reputable local medical clinics and hospitals including those where English is spoken (local US Embassies and Consulates also maintain such lists) to share with the faculty/staff leader. The faculty leader may also share their knowledge of such resources in-country. Should a student need to go to a doctor or a clinic, the faculty leader should accompany them to provide support and, where applicable, translation services. Anyone accompanying a student to a doctor, or a clinic must be aware that sharing any information regarding the student's condition is subject to FERPA privacy legislation. A critical component to this coordination is contact with the Office of Global Safety so that staff can coordinate with the travel assistance provider.

If the students are housed with local families, the families should be notified that they are required to notify the faculty/staff leader immediately of any emergency involving the student(s) in their care. If the students are housed in a residence system or rented house, the local housing supervisor must be similarly informed. It is advisable for the faculty/staff leader to be housed with the students or in close proximity. If the faculty/staff leader is not housed with the students, the students must have the address and telephone number of the faculty member, and the faculty member must be available by telephone 24/7.

#### The Office of Global Safety should be notified of any emergency occurring during an approved trip.

#### **On-Site Briefing**

Faculty/staff leaders should remind the students that they are required to inform the leader about any emergency, and the faculty leader will in turn report the emergency to the program as quickly as possible. Faculty/staff leaders should assure students that this information will be treated confidentially and shared only on a "need to know" basis. Students should also be informed that if the crisis is grave enough to jeopardize their safety or wellbeing, their emergency contacts will be informed by the program.

Faculty leaders should discuss preventable accidents with students such as traffic patterns, pub and drinking culture, drug laws, unsafe swimming, and the type of things that can happen when walking alone at night in a foreign location.

Students should be instructed that in cases of local unrest, natural disaster, or suspected terrorist activity, they should report to the faculty leader via cell phone immediately. Unless movement would jeopardize their safety, it is recommended that the group meet at their place of residence to be accounted for and to receive further instructions.

#### Faculty leaders must provide students with a list of contacts for:

- 1. 24-hour emergency contact
- 2. Nearest US Embassy or Consulate

- 3. Law enforcement/police
- 4. Nearest hospital/emergency facility and English-speaking health care providers

## **Section 17** General Steps for Emergencies

**Overview: Emergency Protocols** 

#### **Immediate Actions for Emergencies While Abroad**

Emergencies can occur anytime. Therefore, it is incumbent on the traveler to be prepared. What to do:

- Seek safety. The travelers should travel to a safe location. Sometimes staying in place is the safest thing to do. If immediate assistance is needed, contact the local equivalent of 9-1-1 to obtain police, medical or other assistance from the local authorities.
- Students should notify program director or group leader ASAP.
- Let AU Global Safety Know call AUPD (+1-202-885-3636) and they will contact a member of the Global Safety Team.
- Contact AxA TAP TAP can provide services if you need to be evacuated, you experience local communication problems, safety is threatened by sudden unrest, etc.
- American Citizens can contact the U.S. DOS American Citizen Services, who are prepared to assist with emergencies abroad.

#### **Title IX Situations**

All cases of Title IX concerns require immediate attention and therefore may classify as an emergency situation. Title IX applies to all sexual misconduct, discrimination, or harassment regardless of the gender, gender identity or sexual orientation of the complainant or respondent. If you are unsure of how to categorize an incident, anything of this nature is still a reportable offense.

Note that situations can be student-student, faculty-student, and stranger-student.

Under Title IX, American University prohibits sex- or gender-based harassment and discrimination, sexual violence, relationship violence, and stalking. Under American University's <u>Title IX Sexual Harassment Policy</u> and <u>Discrimination and Non-Title IX Sexual Misconduct Policy</u>, the university expressly prohibits any form of discriminatory harassment on any protected bases, including dating violence, domestic violence, rape, sexual assault, sexual harassment, and stalking.

#### **Obtaining Emergency Assistance**

If you are in an emergency situation, call the country's 911 equivalent phone number immediately and get medical assistance. Then, call 202-885-3636 to make notification to the Office of Global Safety and your program.

If you or someone you know has experienced sex- or gender- based discrimination, sexual violence, dating or domestic violence, or stalking the below resources are available to you. It is important to know that some resources will differ if the incident occurred several weeks or months ago. For example, certain medical services or evidence collection exams are more effective immediately following an incident. Choosing to utilize any of the below resources is an individual decision and a resource that best serves you may not be the resource another person would choose to utilize. You may use as many of the following resources as you need.

#### **Contact Law Enforcement**

If this is an emergency, call the country's 911 equivalent phone number. Law enforcement can provide immediate intervention in emergency situations, document the situation, and/or initiate a criminal investigation.

#### Report the Incident to the University

You are encouraged to report sexual violence, relationship violence, stalking, and other misconduct to the University. Reporting to the University provides you with the option of addressing the incident under the University's Discrimination and Sexual Harassment Policy. Making a report also allows the University to provide any available interim protective measures such as academic accommodations, housing changes, changes to class or work schedules, and no contact directives. When you make a report, you are not required to decide on any particular course of action.

To communicate with the Office of Equity and Title IX to submit a report, file a complaint, or identify a concern regarding sexual harassment or sexual misconduct of any type or other issues of harassment or discrimination, please submit a report online or email: equityoffice@american.edu. You can also reach the Office by calling 202-885-8080. You may bring a support person along with you to any meetings with the University related to the report.

#### **Seek Confidential Support**

American University has designated the following confidential resources to support community members who may have experienced sex- or gender-based discrimination or harassment, sexual or relationship violence, and stalking. Community members who have experienced any of these are highly encouraged to seek support.

- Confidential Resources for Students\*
- Victim Advocacy Services Center for Well-Being Programs and Psychological Services www.american.edu/ocl/counseling/victim-advocacy.cfm
- Professional Counselors Counseling Center
- Mary Graydon Center 214 (including the satellite location in the Washington College of Law) www.american.edu/ocl/counseling
- Medical Providers Student Health Center
- McCabe Hall first floor; (202) 885-3380; shc@american.edu www.american.edu/ocl/healthcenter/
- Ordained Clergy Kay Spiritual Life Center
- Kay Spiritual Life Center lower level; (202) 885-3320; kslc@american.edu www.american.edu/ocl/kay

#### Confidential Resource for Staff and Faculty\*

Faculty and Staff Assistance Program (FSAP)

\*Because of the confidentiality afforded to these relationships, community members should know that these confidential resource persons are not in a position to report the discrimination to university officials or to intervene to end the misconduct. To ensure University involvement, a report should be submitted to the Title IX Office or appropriate Title IX official.

### **Section 18** Responding to Emergencies

Emergencies can be a situation that engenders extreme danger. For example, a student can misplace or lose a passport. A more significant issue is that a war could break out and individuals may need emergency transport out of the country. Each situation must be addressed in its own context. In all cases, faculty/staff leaders must submit an Incident Report to the program as soon as possible for each occurrence. When an emergency occurs, faculty/staff leaders must maintain regular contact with their program and with host country contacts. Members of the host culture may be best able to assess the seriousness of any given situation and provide the best advice.

In an emergency, the faculty leader's first responsibility is to safeguard the safety and wellbeing of the students. They should do whatever is necessary, whether this means obtaining prompt local police or medical attention, US Embassy intervention, or police protection. All expenses related to the management of a reported emergency will be covered or reimbursed by the program or by the travel insurance provider depending on the situation.

Once all has been done to ensure the students' immediate wellbeing, the program must be notified as soon as possible to be fully informed about the situation (an email is sufficient if no further action is needed). Faculty/staff leaders can reach the Program Director/Program Manager by cell phone or through AU Police. The Program Director/Program Manager will then inform other members of the AU administration, as necessary. During an ongoing crisis, the faculty leader must keep the program informed on a regular basis by telephone or email until the crisis has resolved/subsided.

If there is a continuing risk to students (during political unrest or terrorist threat, for example), the faculty leader should contact the local US Embassy or Consulate, follow whatever procedures they advise, and stay in contact with the Embassy or Consulate on a regular basis for updates as the crisis unfolds. In other types of emergencies (theft, assault, etc.) the faculty leader should notify the local police if they and the Embassy feel it to be appropriate and then follow the procedures the police may require of them and/or the student.

Evacuation from a study abroad location is typically a last resort action. In many situations, it is best to shelter-in-place rather than draw attention to the group through an evacuation process. The program will, however, decide to evacuate a program either to another overseas location or back to the United States if a situation were to deteriorate to the point where the potential risk to participants is deemed unacceptable.

If this unlikely event occurs, the Program Director, in consultation with Risk Management and the travel assistance provider, the faculty leader, (and in discussion with the US Embassy) would develop a detailed evacuation plan. The plan should be shared with all participants including all faculty and staff, and officials from both the travel assistance partner and the program would collaborate with all participants throughout the evacuation process.

In general, faculty/staff leaders should follow these guidelines when communicating with students during an emergency:

- Share information. Provide as accurate information as possible. Document the situation and communicate with the program on an ongoing basis. Copy the Director of the program on all messages.
- Assess the situation. How long will it last? Is it an inconvenience or a threat?
- Keep calm, and keep others calm. Do not panic. Discourage students from gossiping and thus escalating the situation.
- Give participants choices. In an emergency, allow students, when possible, to make their own
  informed decision about whether to leave the program or to stay. Remember that this option is
  only ethical when students have enough information to make a reasonable choice. In a serious
  emergency, the Program in consultation with Risk Management will determine whether or not
  the program will continue.

In those rare cases where the host country emergency services are not readily available, and participants feel there is a threat to their personal safety they should follow these procedures:

- 1. Call AU Public Safety at 202-885-3636
- 2. Identify themselves as a study abroad student and give the country where they are located
- 3. State their name(s)
- 4. Tell the AUPD Dispatcher what problem has occurred.
- 5. Tell the AUPD Dispatcher how to contact them
- 6. Respond to questions and listen carefully to any instructions

Finally, note that AU requires all sexual harassment complaints be reported and processed. To review AU's policies regarding sexual harassment or assault, go to:

https://www.american.edu/ocl/titleix/policy.cfm

If a crime should occur, faculty leaders must make a full incident report to the program and Risk Management and to the local police.

# Section 19 General Steps for Responding to a Large-Scale Incidents (Terrorist Attack, Civil Unrest, Outbreak of War, Natural Disaster, etc.)

#### **Account for All Participants**

- Meet at pre-arranged emergency meeting place, account for all students, and follow directives of the local authorities. Locate and contact all program participants as quickly as possible to ascertain their well-being, and to coordinate an immediate response plan. Communicate with students via cell phone using cell service or whatever apps you have previously decided upon with your group (e.g., WhatsApp, Facebook Messenger, etc.) Depending on the situation, the faculty/staff leader may or may not gather the participants together in a group. Advise participants to inform their parents, guardians, or emergency contacts of their safety and whereabouts as soon as possible.
- **Identify a safe location**. Once everyone is together, identify if the current or alternative location is best. You may want to consult with the local US embassy for help in identifying a place.
- Contact American University Office of Global Safety to send updates and assure that all students are accounted for. It is critical that program leaders regularly check their email accounts for updates and instructions.
- **Contact AXA Travel Assistance** for any hospitalization, emergency situation requiring an ambulance, fire, etc. Do not call for a regular doctor's visit.
- **Contact American University Police** to inform them of the situation. They will work with you to develop the best course of action.
- **Contact the Program Director** via email (as you are able) after calling AUPD to provide a synopsis of the situation.
- Find Reliable WIFI and Electricity
  - A large-scale emergency will require ongoing contact and your connection to American University is valuable. Every situation will be different and once contact is established with AU; administrators will provide further instructions.
- Follow plan determined by American University
  - After AU is informed of an emergency, and after we consult with you and other appropriate individuals on site, we may, depending on the acuteness of the crisis, email you a description of the course of action that you and the students will need to follow. If a student is not able to continue with your group, leave the student with the other faculty/staff member on your program or an American University -appointed liaison to assist with the situation. Notify American University and tell us who is aiding. It is not appropriate to appoint another student as the liaison. Depending on the situation, it may be appropriate to **contact the local U.S. Embassy or Consulate** regarding the crisis and follow whatever procedures they may require. Ask the Embassy or Consular Officer to advise you on a regular basis about the evolution of the emergency and about how you should direct AU's on-site response.

#### Additional notes of good practice

During a political crisis or other emergency during which foreigners in general or U.S. citizens in particular may be at risk, tell students to keep a low profile and to not travel in large groups.
 Tell them to avoid demonstrations, confrontations, or situations where they could be in danger; to avoid behavior that could call attention to themselves; to avoid locales where foreigners or Americans are known to congregate; and to remove signs, luggage tags and clothing that would

- label them as Americans. Have a pre-arranged plan requiring that all students return to their residences during such a crisis, assuming it is safe to do so.
- Experts say that during a political emergency, it is unwise to change locations. Therefore, it is unlikely that students would need to be evacuated from a site abroad. However, leaders and students would be brought home if a situation were to deteriorate to the point where the degree of risk to students was deemed unacceptable. If this were to happen, AU would consult with you, our intel partners, and our travel assistance provider and possibly, the U.S. Department of State. We would develop an evacuation plan in as much detail as possible. This plan would be transmitted to you in confidence, and AU would continue to collaborate closely with you throughout the process.

# Section 20 Guidelines for Sending Participants Home from a Faculty-Led Program

#### **Voluntary Returns**

There are several reasons a participant may need to return home during an American University Study Abroad Program, regardless of its duration.

Some students return home voluntarily. This could be the result of an illness or has a death in the family. In such cases, the faculty/staff leader will offer support and compassion, but should outline, in writing, the consequences that returning home will have on the participant's ability to complete the course and receive credit. If necessary and whenever possible, the participant should be encouraged to withdraw from the course. A voluntary return home will be at the student's expense.

#### **Medical or Psychological Reasons**

The faculty/staff leader (or the participant) may believe that participant should return home for medical or emotional/psychological reasons. In such cases, the faculty/staff leader should seek professional advice on the participant's condition and on the best procedure to follow. Faculty/staff leaders must consult with their respective Dean and the Dean of Students when making this difficult decision. If it is determined that the participant needs to be accompanied on the return home, consult with the Travel Assistance Provider, AXA, to determine if this will be medically covered. Medical professionals can be dispatched for escort if the treatment professional consults with AXA and authorization is granted through insurance. If no consultation is engaged, one of the AU leaders participating in the program may need to return with the student. In rare instances, a family member or alternate staff person may need to fly to the program site to accompany the participant home. The specific department should be queried as to the best option. Once a decision is made, including consideration for a participant's family member to travel, as necessary, a ticket may have to be arranged for whoever will accompany the student home under these circumstances and paid for with contingency funds. Remember, if this is an emergency situation, family members must confer with AXA first to determine if their travel to the student will be covered by insurance. The Office of Global Safety should be contacted immediately to consult and serve as liaison between the staff and AXA.

#### **Disciplinary Reasons**

If the faculty leader experiences disciplinary problems with students, those problems should be addressed immediately. If allowed to continue, they can adversely affect the atmosphere and morale of the entire group. Depending on the circumstances, the faculty leader may wish to discuss the problem individually with the student(s) concerned or discuss it openly during a general non-academic meeting with the group. If the behavior persists after discussion, the faculty leader should issue a written warning outlining the expected change and the consequences if the behavior does not change. The student should sign this document, and a copy should be sent via email to the program. Should the inappropriate behavior persist, the program will fully support a decision to dismiss the student from the program. Risk Management should be notified.

The program must be notified immediately regarding any serious disciplinary problems with any student on the program, whether or not an arrest is involved. In less serious cases, mediation by the program may help resolve the situation. In more serious cases, the student may be dismissed and sent home, with failing grades awarded and no refund. Damage control or corrective measures will be necessary at

the host site and within the local community. The faculty leader should make amends for the inappropriate behavior in a culturally appropriate way.

Faculty and/or staff members in charge of administering the program must carefully and conscientiously document it in writing. The leader must make such a decision in consultation with the Dean of Students or school Dean, and the faculty member must notify the participant in writing of his/her expulsion from the program, using the appropriate form. It is recommended that counsel be consulted before a final decision is made.

The participant cannot be forced to sign the form, but the faculty/staff leader must document that the participant was given an opportunity to read and sign the form in lieu of signature. The faculty/staff leader, Dean of Students, or American University cannot control the decisions that the participant makes following expulsion from the program. While the student is expected to return home, and do so at his or her own expense, students and other participants are adults and, as such, they cannot be forced to return to the United States against their will. The faculty/staff leader should never leave a participant in a situation perceived to be dangerous, *unless* imminent danger to the other participants requires removing the group from the situation and a participant refuses to follow directions.

#### Arrests

In cases of arrest, AU assumes no fiscal responsibility for legal aid to students. However, it is appropriate for the faculty/staff leader, along with the program, to assist students in contacting their families and appropriate government offices. The program will also inform the AU Dean of Students' Office which will then take over the management of the situation from the AU side.

Students using or selling illegal substances will be immediately dismissed from the program, with failing grades and no refund.

#### **Sending Students Home**

Severely problematic students may need to return to the US early. Faculty leaders may decide a student should return home in response to:

- Criminal activity on the part of the individual
- A continuing pattern of culturally inappropriate behavior that does not improve with advising and which endangers the program's relationship with the host site
- A continuing pattern of behavior that is insensitive and damaging to the group that does not improve with advising
- A continuing pattern of behavior that interferes with other participants' learning and does not improve with advising
- An emotional crisis that affects the individual
- Serious illness, physiological or psychological

Faculty leaders should document the ongoing problems in detail and the decision to send a student home must be made in consultation with the program who will in turn advise the AU administration of the decision.

#### **Cancelling a Program**

The faculty leader, in consultation with the program and the Risk Management, may decide to cancel a program in response to:

- Death of a program participant
- Kidnapping of a program participant
- Outbreak of highly infectious disease at the host site
- Natural disaster
- Political or civil emergency
- Serious illness or injury suffered by the faculty leader

Any decision to send students home, even when made for the best reasons, may result in negative responses including lawsuits instigated by students and their families and difficulty in re-establishing the program in future. It is therefore essential when considering an expulsion or evacuation to consult immediately with the project staff who will, in turn, consult with other appropriate offices on the AU campus.

# Section 21 Faculty-Led Programs Abroad and the Family Educational Right to Privacy Act (FERPA)

#### **FERPA Regulations**

The Family Educational Records Protection Act of 1974 (FERPA) limits the amount and type of student information that educational institutions can release. In your capacity as a university employee, FERPA allows you access to online or printed academic and personal student information on a "need to know" basis. Access to this information is given primarily by the Registrar's Office and is governed by specific responsibilities and limitations, including not disclosing any student's directory information and not allowing your ID to be used by others not authorized for such access.

#### **How Does FERPA Relate to Faculty/Staff-Led Programs?**

As official university activities, faculty/staff-led study abroad programs are also governed by FERPA even when students are out of the country. This is important to remember since FERPA procedures may be quite different from the way in which foreign institutions handle educational records; a foreign institution might permit access to information concerning an AU student that you, in your capacity as an AU faculty/staff leader could not permit or disclose.

#### When Can a Faculty/Staff Leader Release Student Information?

It is inappropriate to communicate with parents about a student's grades, personal relationships, or cultural adaptation without prior permission of the student. Students participating in AU programs are given the opportunity to <u>sign a release</u> form that allows recognized program staff to disclose information to their families in case of a medical emergency. American University does permit access or release of personally identifiable information to certain parties without the consent of the student in some situations. Those that are most applicable to the Faculty/Staff Leader are:

- Appropriate persons in connection with an emergency may access information if the knowledge of such information is necessary to protect the health or safety of a student or other person(s).
- Persons or organizations providing financial aid or making decisions relating to providing financial aid may have access to information about students associated with the individual programs.
- In addition, all students participating in faculty/staff-led study abroad programs at American University agree to the following in the *Participation Agreement*: "In the case of a potential health risk or a medical, natural, social, or part ii, American University will consider any and all communication with my emergency contact(s) as internal communication." By signing this, the student is allowing American University to release information to emergency personnel and/or the student's designated emergency contacts in the event of an emergency. Typically, but not always, the student has designated his/her parents as the emergency contact. In all other situations, however, American University and the faculty/staff leaders must abide by FERPA regulations.

If a faculty leader believes that certain information should be disclosed for a participant's wellbeing without his/her consent, the faculty leader should first contact the program director who will seek the advice of AU's General Counsel. In rare cases where it is not possible, such as an urgent and serious

medical emergency, the faculty leader should act in the way that will most benefit the student. Faculty leaders must remember to document all emergencies thoroughly and keep in regular contact with the program staff regarding the situation.

### Section 22 Conclusion

Despite all of the precautions and warnings, the heath issues and hazards listed in the Guidebook can and have occurred over the years. US-based institutions send thousands of students overseas every year, with little incidence of badly-behaved students, serious health emergencies, or natural disasters. It is important to keep the well-being and educational success of students in view at all times.

This Guidebook is designed to prepare and assist faculty/staff leading trips abroad, which means the worst-case scenarios must be considered. The health and safety of the students is American University's

priority and though incidences of such occurrences are rare, the guidelines set forth in this Guidebook are created to protect both the student and the liability of the American University. When in doubt, remember that you can always reach out to AU's main campus for guidance on the next steps to take and always act in the best interest of the student.