From: <u>Human Resources Admin</u>
To: <u>FIU Faculty and Staff</u>

Subject: Important Compliance Reminder: International Travel on Behalf of FIU

Date: Tuesday, December 3, 2024 11:28:31 AM

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To: FIU Faculty and Staff

From: Jennifer LaPorta, Chief Compliance Officer

Office of University Compliance & Integrity

Alexandra Mirabal, Associate VP and Controller

Office of the Controller

Birgitta Rausch Montoto, Director

FIU Global

Date: December 3, 2024

SUBJECT: IMPORTANT COMPLIANCE REMINDER: INTERNATIONAL TRAVEL ON BEHALF OF FIU

Pursuant to Florida State legislation <u>F.S. 1010.36</u>, BOG <u>Regulation 9.012</u>, and other guidance by federal and state agencies, FIU is required to screen and report certain international travel activity. The University's travel authorization and expense report processes are designed to meet the required screening, pre-departure approvals and post-travel compliance reporting for all international trips.

Pre-departure Approval Process:

As a reminder, all FIU faculty, staff, student-employees, courtesy faculty, persons of interest, and volunteers traveling abroad on FIU-sponsored or FIU-related trips (Travelers), are required to complete a Travel Authorization Request (TA) and Expense Post Travel Compliance Report (ER). A TA is expected to be submitted at least twenty business days prior to the travel date and must be fully approved before travel commences and any expenses are incurred by the University.

Please note that students not employed by FIU follow a different process which includes completing a required pre-departure travel registration and orientation prior to going abroad through the Office of Education Abroad.

When completing a TA, travelers are required to complete a pre-departure Foreign Travel Guidance and Screening Questionnaire and acknowledge their understanding of and agreement to abide by FIU's Guidance for International Travel. This must be completed and approved prior to travel taking place. FIU travelers or proxies are expected to submit their foreign travel TAs at least twenty (20) business days before departure and before any expenses are incurred by the University to allow sufficient time for the request to be screened by the Export Control Office, and fully approved. There are significant restrictions related to foreign countries of concern (FCC), which may impact screening time and approval (FCCs include the People's Republic of China, the Russian Federation, the Islamic Republic of Iran, the Democratic People's Republic of Korea, the Republic of Cuba, the Venezuelan regime of Nicholas Maduro, or the Syrian Arab Republic). For this reason, it is recommended that TARs involving these locations be submitted as early as possible. Please note that if the Compliance/Export Control Office does not complete its screening and assessment or returns the TA unapproved, the traveler cannot proceed on the trip.

If the traveler embarks on the trip without full TA approval, the traveler will be entirely responsible for all trip expenses incurred, resulting in non-reimbursement of expenses paid by the traveler from personal funds as well as a repayment required from the traveler to the University for expenses paid with university funds. This includes grant-funded international trips, as grant funds will not be disbursed without pre-departure TA approval. FIU will follow the requirements of FIU Regulation 1111, Employee Debt Collection for the collection of any expenses for unauthorized trips. Further, an employee's international travel privileges may also be suspended/restricted.

Post Travel Compliance Reporting:

Additionally, all travelers to an international location must complete an Expense Post Travel Compliance Report (ER), that must be submitted within fifteen (15) business days after the completion of the trip, even if no expenses were incurred. The ER will also require travelers to report any honoraria and/or payments received from a foreign source within the expense report system. The traveler's proxy may enter all trip related information (as provided by the traveler) in the ER, but the traveler must sign the completed ER document to certify its accuracy.

Non-Compliance with Federal, State, and Institutional Requirements:

The Provost or his/her designee reserves the right to restrict international travel until

further notice for travelers who do not complete and meet all legal and institutional pre-departure and/or post-travel requirements outlined in the University International Travel Policy and the Travel and Other Expenses Manual. Non-compliance with these requirements may result in disciplinary action.

Please refer to FIU Travel Policies, 320.099 International Travel Policy and 1110.060 University Travel Expense Policy for additional guidance. Information regarding International Travel screening and guidance may be found on the FIU Export Controls website ("Guidance for International Travel") or you can contact our Office of Export Controls at export@fiu.edu. Our Export Controls team will promptly partner with you to answer questions and provide support.