Confronting A Crisis: Developing Institutional Response Procedures to U.S. Department of State Travel Warnings

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(This paper is an updated amalgamation of three past publications from the *International Educator*. See page 14 for appropriate references).

Introduction
Deciding whether to send students to countries with a U.S. Department of State (DOS) Travel Warning [hereinafter "Travel Warning"] is a delicate matter on most campuses, but it is a decision that cannot be ignored. To unknowingly or willingly sponsor student study or travel in locations where the U.S. government warns citizens not go, or limits the travel of its own employees, poses risks for students and the institution. Such risks may be real or perceived, and if not appropriately managed, could not only put students in harm's way, but also result in negative publicity or even legal action against the institution.

The level of risk an institution is willing to bear is a management decision, and there is no correct answer suitable for every institution. Some institutions have straightforward policies that prohibit travel to any location under a Travel Warning. In such cases, decision-making is relatively simple. For these institutions, which typically lack the time, personnel or expertise to properly analyze Travel Warnings in light of proposed program activities, this is an understandable method of managing risk. At the other end of the spectrum are those institutions that lack any policies or restrictions tied to Travel Warnings. Such institutions risk criticism for ignoring 'official' government advice not to travel to such locations. As a result, some of these institutions may require travelers to sign a release acknowledging the Warning and the institution's inability to assist them in an emergency.

Somewhere in the middle are institutions with more flexible policies that trigger a review process when a Travel Warning is issued, and this appears to be a growing trend in the field. Such a process allows institutions to support valued international activities in areas of heightened concern, but also to better manage risk. It is also a way to demonstrate the institution's due diligence in the tragic case that a student, staff or faculty member falls victim to a danger outlined in the Travel Warning. Most of these institutions engage in a review and approval (or denial) process described in this document and many have even expanded upon the process to assess and manage risks in order to authorize a program to proceed in a country already under a Travel Warning. Part one reviews the history and development of the U.S. DOS travel information program. Part two addresses issues that must be considered before a policy or procedure can be developed. Part three outlines the information collection and dissemination process that will support a Travel Warning review procedure. And lastly, part four presents a checklist of steps to prepare or put in place one the Travel Warning has been issued. Following the conclusion and acknowledgements, a long list of references and useful web links are provided.

Public perception of risk
International travelers have long associated Travel Warnings, the highest level of alert from the U.S DOS, with conflict zones, failed states or countries where the U.S. lacked diplomatic relations. However, increased efforts by the U.S. DOS to better inform the traveling public about safety and security risks have resulted in the issuance of more frequent Travel Warnings to popular study abroad destinations,

such as Egypt and Japan (whose Warnings are no longer in effect) as well as Israel, Mexico and Kenya, whose Travel Warnings remain in effect and will likely be in place for some time.

Continued media focus on these Travel Warnings has prompted college students and their parents to ask more questions about risk assessment. Unfortunately, many institutions offering study abroad programs lack a systematic approach to risk review and assessment, and few guidelines exist to help education abroad professionals develop such procedures, yet waiting until the crisis occurs is too late. If harm is imminent, any delay could put students, faculty and staff abroad at risk. A thorough review requires significant time and effort, but reviewing criteria well in advance of the need is both necessary and worthwhile. It is hoped that the following guidelines can help you develop a process that complements your institution's tolerance for risk.

Part I: History of the U.S. Travel Information Program

The dissemination of risk information by the U.S. DOS began during the Carter Administration when a travel information program for the general public was launched in 1978. At that time and in subsequent years, bulletins in the form of Notices, Cautions, Public Announcements and Warnings were issued to airlines, travel agencies, and passport processing centers for dissemination to their clients. However, for many years few guidelines existed regarding the content or delivery of such advisories. For example, in December 1988, the Federal Aviation Authority issued a security bulletin regarding an anonymous yet credible threat to an undetermined Pan Am flight departing from Frankfurt, Germany. The U.S. DOS, in turn, sent a bulletin describing this threat to several of its embassies, but not to the general public. Tragically, on December 21, 1988, Pan Am Flight 103 exploded over Lockerbie, Scotland, killing all 259 passengers and crew on board as well as 11 people on the ground.

Over the next few years, debate ensued as to what level and type of security information regarding aviation threats should be released to the public. In 1990, Congress passed the Aviation Security Improvement Act, which added a requirement to the Federal Aviation Act that the President "develop guidelines for ensuring notification to the public of threats to civil aviation in appropriate cases." Once these provisions were enacted, the U.S. DOS developed the "No Double Standard Policy," comprised of rules for non-civilian aviation contexts. Under this Policy, any security threat to U.S. citizens that is deemed specific, credible, and non-counterable will be disseminated to the public through U.S. consular information program communications such as Travel Warnings, Travel Alerts and/or Emergency Messages.

Information sources and authors
Sources for these communications include local law enforcement, media, the intelligence community, and embassy staff as well as a country's own intelligence agency or other similar government agency similar to the U.S. DOS, such as the U.K. Foreign and Commonwealth Office or the Australian Office of Foreign Affairs and Trade. In 1992, U.S. DOS consular communications were regrouped into three categories: Warden Messages, Public Announcements and Travel Warnings. In 2007, Public Announcements were renamed "Travel Alerts." In mid-2011, the term "Warden Message" was replaced by two new classifications: "Message for U.S. Citizens" and "Emergency Message for U.S. Citizens."

Today, U.S. embassies or consulates (also referred to as "posts") will issue a Message for U.S. Citizens to disseminate information about routine topics such as voter registration, income taxes, new passport procedures and other non-security issues of interest to the local U.S. citizen community. The U.S. DOS

along with relevant posts will issue an Emergency Message for U.S. Citizens to inform U.S. citizens about events or threats that can affect their personal security. This includes demonstrations, civil disturbances, natural disasters, terrorist attacks and other breaking events. Whenever the U.S. DOS revises the Worldwide Caution or issues a Travel Alert or Travel Warning for a country or region, this information will also be disseminated through an Emergency Message for U.S. Citizens.

Michelle Bernier-Toth, Director of American Citizen Services in the Bureau of Consular Affairs, U.S. DOS, described in an interview conducted with the author in June of 2010, how the authors of these consular communications differ slightly by type. A Message for U.S. Citizens is produced by embassies or consulates and approved by the U.S. DOS. Messages for U.S. Citizens are typically low-level advisories intended for expatriates living in the area, although they can also be useful for travelers since they remind residents of public holidays or transportation issues such as train strikes, roadblocks or planned public demonstrations. Emergency Messages for U.S. Citizens, Travel Alerts and Travel Warnings, on the other hand, are a collaborative effort between a foreign embassy and the U.S. DOS. Travel Alerts describe temporary threats, including potential risks related to elections, major sporting events, isolated incidents of civil unrest related to political or economic issues facing the country, outbreaks of widespread disease, such as H1N1, or a short-term break-down of infrastructure following a natural disaster. Travel Warnings are the highest level of advisory, describing long-term, systemic, dangerous conditions tied to political, social, economic or environmental conditions. Also, in some countries for which Travel Warnings are issued, the U.S. government's ability to assist travelers in distress may be severely limited due to internal or external travel restrictions.

She clarified that although a Travel Warning technically applies to an entire country, the dangers and cautions may be specific to certain cities or regions within the country, such as Mexico's border areas or the Mindanao region of the Philippines. A Warning may or may not recommend deferring all travel, but may order or merely authorize the departure of dependents or non-essential embassy or consulate personnel. Bernier-Toth likened writing a Travel Warning to a craft: "The language is calibrated to reflect the security situation as we have assessed it. In sum, not all Warnings are created equal."

Therefore, Warnings should be reviewed in light of the itinerary, activities, accommodations, and "expertise" of the traveler. For example, Bernier-Toth pointed out that the Travel Warning to Lebanon reflects risks to American travelers, yet she feels that Lebanese-Americans who travel regularly to the country may be more comfortable with the potential risks involved because of their ability to assimilate. They often stay with families and are integrated into residential communities. This is a lower risk environment than the high-rise hotels and restaurants of Beirut frequented by Westerners. Education abroad programs with local institutional affiliations that attract travel-savvy students capable of blending into their environment, and who will be housed in home stays or apartments may face less risk than a short-term study tour comprised of an easily identifiable group of western students.

The Evolution of a Travel Warning

When a Travel Warning reflects pervasive, violent, indiscriminate criminal activity, i.e., the border areas of Mexico, its evolution may be traced through the increasing number and intensity of Emergency (formerly 'Warden') Messages. In the Mexico example, we saw multiple Warden messages referencing drug-related crime in northern Mexico for several months preceding the issuance of a Travel Alert in February of 2009. This Travel Alert lasted an unusually long time —thirteen months— until a Travel Warning was finally issued in March of 2010, following the authorized departure of dependents of the U.S. Consulate in Ciudad Juárez. In this case, three people associated with the Consulate had been

murdered, including a U.S. citizen employee, her U.S. citizen husband, and the husband of a Mexican national/employee. No evidence has surfaced, however, to indicate that the victims were singled out because of their employment by the U.S. government or their U.S. citizenship. Recent reports from the U.S. DOS seem to indicate these deaths were the result of mistaken identity.

In other cases, a Travel Warning may be issued quickly. This occurred in Georgia in August of 2008, when the conflict between Georgia and South Ossetia put civilians in the crossfire with less than 24 hours notice. Usually, however, sudden Travel Warnings like this follow a large-scale, severe natural disaster, as was seen in Haiti in 2010 and in Japan in 2011.

Part II: Pre-Policy/Procedure Considerations

Before being able to craft a Travel Warning review and response policy/procedure, several steps are necessary to ensure your plan meshes with your institution's operational exposure, evacuation insurance coverage and the potential limitation of U.S. government services. It is also useful to establish a risk review committee on campus that is charged with regularly evaluating the risk involved in all education abroad programs. The following section will discuss establishing these steps in more detail.

Program and exposure inventory
First, it is important to establish your institution's operational exposure by taking an inventory of current international activities. Without this information it is difficult to make significant policy decisions associated with international travel. Knowing where your students are currently permitted to travel will determine the institutions tolerance for risk. Risk tolerance will vary by institution and will be based on your unique history, culture, and organizational structure.

The first step in creating an inventory should be to define the scope. Will you be cataloging only study abroad programs, or all of your institution's international activities involving students? Will data collection be limited to undergraduate or graduate students? Once you have defined your scope, note the type, duration and location (city) of the activity on a spreadsheet.

The *type* of activity is important because different activities pose different levels of risk. For example, faculty-led study abroad programs generally pose higher-risks to institutions (even though they generally operate over shorter time periods than semester-long, direct enrollment programs) because faculty leaders are generally less equipped to prepare for, or respond to, emergencies, in contrast to the staff of longer-term, permanent programs abroad (often referred to as direct enrollment or third-party providers), who generally have regular experience with crisis management. While there may be no "home campus" staff on a direct enrollment or third-party provider program, such operations usually also have a full contingent of support staff and student services, such as a health clinic and campus security force, that are ready to respond to a variety of emergencies, particularly natural disasters common to the region. Internship or service-learning projects can vary in risk depending on the degree of supervision as well as the activity involved. Laboratory settings with volatile chemicals or rural teaching internships in developing countries, for example, pose higher risks.

On the other hand, short-term programs, usually defined as one to seven weeks, at overseas branch campuses or attendance at scholastic conferences, performances at arts festivals or participation in sporting events in capital cities may expose travelers to petty crime or non-life threatening health conditions such as travelers' diarrhea, but the limited duration suggests the risk of experiencing more

serious problems is relatively low. Participation in long-term development projects in extremely rural or high risk locations, like Somalia or Pakistan, may expose students to serious health risks, terrorism or kidnapping. However, if the project is co-managed by local experts staffed by area residents, integrated into daily life and of high value to the community, certain risks are diminished because the residents and local authorities often work in concert to help maintain a project's security.

Limitations of government services

While the general public may assume that the U.S. government will provide comprehensive evacuation services to its citizens overseas, there is, in fact, no guarantee of such service. Therefore, no Travel Warning review or response procedure should rely solely on the U.S. government for evacuation. If the U.S. government elects to remove U.S. citizens (typically by air) from a foreign country, such arrangements are made at the discretion of the U.S. DOS and usually only when capacity is lacking in the private sector, or if commercial carriers have ceased operations in the affected locations. In addition, transport is only intended to get travelers to the nearest safe haven, not "home."

It's also important to remember that the U.S. DOS has specific departure classifications pertaining only to its employees, contractors, or grantees. An *authorized departure* permits non-emergency personal and eligible family members to leave post if they want (and at their own expense). An *ordered departure* coincides with the issuance of a Travel Warning and requires non-emergency personnel and eligible family members to leave the country. In other words, the U.S DOS's authority does not extend to private citizens; it cannot order non-employees (e.g. tourists, students, and business travelers, etc.) to leave a foreign country no matter what the circumstances.

Complicating matters, citizens using U.S. DOS evacuation services are responsible for getting themselves to the airport. Airline tickets for U.S. DOS-sponsored evacuations are issued based on priority according to the following criteria: U.S. citizenship, tour/study groups, and permanent residents with clear ties to the U.S. Efforts are made to keep non-U.S. citizens traveling with a group together, but no guarantees can be made. Third-country nationals will be offered seats on a space-available basis and dual passport holders are subject to the directives of their own governments. For example, U.S. Consular officials in Egypt reported that males of military service age holding dual American-Egyptians age were removed from U.S. government organized evacuation flights out of Cairo last spring. Travelers will also be required to sign a promissory note for an undisclosed amount of money with the cost equivalent to a one-way ticket to the nearest safe haven via commercial air. Many U.S. citizens evacuated out of Egypt were flown as far as Cypress and later billed by the U.S. DOS for $1200.00.

As a result, it's critical to have a flexible policy that allows for institutional or organizational action prior to the issuance of a Travel Warning, particularly if your institution is risk averse or lacks appropriate on-the-ground resources to support students, staff, or faculty. If your institution is risk-averse, your policy should instruct travelers to leave a volatile location before transportation options become limited. Evacuation services companies may be able to respond quicker than the U.S. DOS with regard to organizing and executing departures. "Because we are a private company we can be more proactive. We don't have the political pressures to stand down," stated Linda Langlin, senior vice president, Cultural Insurance Services International (CISI), adding, "In my opinion, [the] State [Department] was 24 hours too late in issuing the Travel Warning to Egypt" in early 2011. With regard to Egypt, Langlin further described how CISI personnel entered Cairo's neighborhoods, located each of their clients' students, arranged transportation to Cairo International Airport, shepherded them through security and accompanied them onto flights to Europe. Once there, CISI worked with the students and their

respective institutions to fly them home or to another university abroad where they had arranged to transfer. Such detailed, personal service cannot be expected from the U.S. DOS.

Limitations of insurance coverage

Another important step in developing a Travel Warning review and response policy is to know whether or not your institution's insurance carrier(s) restricts or excludes coverage in countries perceived to be of high risk, such as countries with Travel Warnings or countries sanctioned by the Office of Foreign Assets Control (OFAC). (OFAC is a U.S. Government agency that enforces economic and trade sanctions based on U.S. national security goals and foreign policy).

If your institution or organization sponsors travel in locations with such restrictions you generally have three options: renegotiate your policy wording to broaden coverage, prohibit the travel, or take steps to mitigate risks and be financially and operationally prepared to support travelers in need. Many insurance carriers are flexible and will consider covering travel to "high-risk" countries if they have a thorough understanding of the proposed travel (group size, duration, destination, etc.), and the University's risk management plan, including emergency evacuation and contingency plans.

The response policy/procedure must also reflect the services provides and/or the limitations of your insurance coverage. While providing study abroad participants with comprehensive medical treatment and medical evacuation coverage is fairly common, plans that offer broader evacuation benefits like political/security evacuation may exclude coverage for natural disasters. Furthermore, even if your coverage provides political/security evacuation coverage, the benefit may not be granted until a Travel Warning is issued by the U.S. DOS and the carrier has determined that conditions warrant immediate departure or temporary relocation. These limitations, if they exist, need to be understood in advance.

Japan-March 2011

The tragic events in Japan in March of last year represented an unprecedented situation. The risks outlined in the U.S. DOS Warning pertained not to security, but to health once it became clear that reactors at the Fukushima Daiichi Nuclear Power Plant in Okumacho began to fail, a day after the earthquake/tsunami that destroyed the northeastern port city of Sendai.

Soon after the first reactors' malfunction on March 12, Japan's Nuclear Industrial Safety Agency (NISA) recommended residents within 10 kilometers (6 miles) of the plant to evacuate the area immediately. Later that same day, the evacuation zone was expanded to 20 kilometers (12 miles). By March 15, the U.S. DOS had issued a Travel Warning containing a recommendation by the Nuclear Regulatory Commission (NRC) that the evacuation zone be expanded to 80 kilometers (50 miles), which continues to remain in effect today. With Tokyo nearly 130 miles southwest of Okumacho, it seemed like students in the capitol and in cities further south, such as Kyoto and Osaka, were safe. Nonetheless, the general public's inexperience with assessing risks posed by potential exposure to radioactive particles, coupled with the expansion of the evacuation zone and concern for contamination of produce, dairy, meat and fish, led many education abroad program administrators to act cautiously, authorizing or even ordering evacuations.

Complicating matters, not all insurance providers conferred evacuation benefits to their clients in such cases. While all were quick to confer benefits for clients in the Sendai region and those located in the recommended evacuation zone, evacuation providers differed on conferring benefits for students in other study abroad locations such as Tokyo, Osaka and Kyoto, where the likelihood of exposure to

nuclear radiation was low. In situations like this, institutions must not only be financially prepared to cover the cost of the students' return, but also be prepared to manage the public's reaction in support of, or in opposition to, a mandatory evacuation.

Risk review committee
Finally, institutions should create a risk review committee charged with engaging in a systematic, comprehensive health and safety program review. This will ensure that a broad range of institutional stakeholders have a voice in determining the institution's risk tolerance and course of action when a Travel Warning is issued, or to authorize program operations in locations already under a Travel Warning. By assigning the task to a group as opposed to an individual, the burden (and risk) of having one person make such a monumental decision is eliminated. This group may be charged with not only assessing risks and requiring various mitigation strategies, but also with program modification, suspension or evacuation. Depending on the size and complexity of your institution, your committee could be comprised (but not limited to) individuals representing the following departments: general counsel, risk management, student affairs, health services, study abroad/international programs, president/provost, university or public relations and campus police/security.

Once the aforementioned issues have been discussed and the risk committee established, you are now ready to craft a Travel Warning preparedness plan.

Part III: Before the Warning is Issued

Before creating a policy or procedure to respond to a Travel Warning, it is useful to establish pre-response elements to facilitate the actual response. There are several steps in this process, but all relate to the receipt or dissemination of information.

Focus on locations of heightened concern
From your risk inventory, prepare a list of locations perceived to be of heightened concern. Factors to consider include frequent or violent civil unrest, high rates of violent crime, unsafe public transportation (poor roads or vehicle conditions and/or lack of traffic laws), and poor sanitation or other health-related risks, such as malaria.

Identify how such risks are currently mitigated and the likelihood of the risk increasing over time. Be prepared to articulate the academic value of programs in these locations, and how the value justifies a certain level of risk. Note how your programs complement broader international initiatives or outreach at your institution/organization. At its best, study abroad programming should reflect an institution's international learning or experiential goals and therefore be supported by various constituencies on campus who share in this vision.

Confer with colleagues in administration, general counsel and risk management about your programs and perceived risks. Seek confirmation that the institution is willing to support such programs; this will help you in the unfortunate case that a student experiences a known risk, such as a danger warned of in any consular documents.

Develop a plan for responding to a change in the risk environment, such as the issuance of a U.S. DOS Travel Warning (*see* checklist, Part IV).

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Student enrollment in locations of heightened concern

Using a map, note the number and exact location of students (street address of local residence and sponsoring institution or organization) in the areas of heightened concern. Also note the types of accommodations, affiliations with local institutions or organizations, and daily activities that involve risk (e.g., taking public transportation, which may be high or low risk depending on the location, time of day and type of transport). Finally, record the types of programs that your students are enrolled in (direct enrollment, provider, faculty-led, branch campus, etc.) and the types of activities they are engaging in (classroom time exclusively, cultural activities, excursions, internships, service learning, research, etc.).

If you haven't already, recommend or require that your students register with the U.S. DOS's Smart Traveler Enrollment Program (STEP). As enrollment is only available to U.S citizens or permanent residents, students from other countries should also register with their respective governments, if a similar service is offered.

This is also a good time to develop a shelter-in-place emergency plan in the case evacuation is delayed or impossible. In some cases, it is a good alternative to evacuation of the emergency is expected to be short-lived. In such some circumstances, it may be safer for students, faculty or staff to remain where they are, depending on their location in a particular city. This was the response that most institutions with students in Thailand implemented in May 2010 during violent political protests in Bangkok. Students were strongly advised to stay away from areas of conflict and, on days when unrest peaked, to remain in their residences for 24-48 hours. In time, the situation normalized and Thai universities, where many U.S. students were enrolled in semester or yearlong programs, reopened and established normal operations.

Peer Networks

Often, uncertainty is created when decisions are made based on blanket requests for data about risk assessment or decisions regarding Travel Warnings emanating from broad-based listservs or networks of education abroad institutions/organizations. To alleviate this uncertainty develop, in advance, a network of institutions or organizations similar to yours with which you can *quickly* share information. Engage in regular exchanges of information with your network about public health or security concerns and best practices to develop relationships and trust. Institutions/organizations whose student body, mission, size, emergency resources and level of risk tolerance most closely resemble yours will be the most relevant in your decision-making process.

News and information

Establish a process that assigns a specific staff member the responsibility of regularly receiving and reviewing media reports and other sources of security information through U.S. government agencies, subscription services, international insurance providers, etc., for the area(s) in question. For example, the U.S. DOS offers a free email service that alerts subscribers to a change in a country's advisory status. In addition, the Overseas Security Advisory Council (OSAC), which is a division of the U.S. DOS's Office of Diplomatic Security charged with providing the U.S. private sector with security information and resources, produces two newsletters each day. OSAC is a free, membership-based organization for any U.S. business, non-governmental organization, faith-based organization, or institution of higher education with overseas operations.

Additionally, many insurance companies and emergency assistance providers offer daily security updates and even specialized reports on high-profile events. There is usually no extra cost for this

information, but advanced enrollment is recommended. You may also wish to subscribe to a security information service. Well-known providers include I-Jet, Stratfor, Control Risks, ASI Group, Eurasia Group, G4S, and Oxford Analytica. Basic information is often free, but other products or services vary in price, so take time to research your needs before signing any agreements. Be mindful that signing up for information services is not the same as reviewing and acting on the information. A process must be in place at your institution that assures that SOMEONE is sharing and acting on the information provided.

Communications Plan

Planning in advance how your institution or organization will communicate about risks with its constituents (students/parents/spouses/campus officials/media) is critical. Be clear with students (and parents) from the start about your institution's approach to risk (warn them of risks, advise them where to get information, give them information, etc.), to allow them to make informed decisions about participating in a program located in a country or region of heightened risk. If you elect to "stay the course," in the midst of a crisis provide an option for students and parents with a lower risk-tolerance to opt out of the program with little or no financial or academic penalty.

Trust, credibility, and transparency are keys to a sound communication plan as public perception based on media reporting is an important variable that you will need to address. In developing a healthy, positive, and factual communication strategy, consider possible rumors that can start and what actions your institution/organization will take to mitigate the spread of rumors. Be attuned to social networking sites where information (both accurate and false) may be disseminated by students, parents and others.

By establishing a comprehensive information gathering and sharing processes, an understanding of your students' location and activities, and a thorough communications plan, you will be ready to effectively review or respond to a Travel Warning.

Part IV: A Checklist for When the Warning is Issued

If you have students in a location affected when a Travel Warning is issued, much will be expected of you. Don't allow yourself to become distracted by individuals or circumstances that prevent you from moving forward with your response plan. At the onset, communicating the institution's knowledge of the Travel Warning and that you are making assessments is critical. As you begin to receive and review information from various sources, provide timely updates to your various constituents until the matter is completely resolved. The following eight-step process can help you do so in an efficient and organized fashion.

1. *Communicate to all relevant constituents*
   Notify relevant campus officials of the Travel Warning and provide an overview of the number and location (city) of affected individuals. Note the types of program(s) involved and the level of on-site staff or supervision. Provide a brief overview of the circumstances that led to the Warning and your estimated timeline for an assessment, recommendation and decision. (Note: these actions are ideally established in advance by your risk review committee, not one individual).

   Next, contact any students, staff, or faculty abroad to inform them of the Travel Warning (hopefully, their travel was already registered through STEP, so they will have already begun to receive regular emails from the relevant U.S. embassy or consulate), and report that you have consulted with your local partners and key officials at your institution/organization to assess safety and security. Share

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your decision-making timeline and provide contact information for someone at the institution to whom travelers and/or their families can direct questions. You may also wish to prohibit travel to cities or states mentioned in the Travel Warning; if appropriate, gently remind travelers that doing so could result in dismissal from the program. Most importantly, solicit input from students, faculty and staff in the affected location. How are they? Does he or she feel safe/unsafe? Why or why not? What personal measures does he or she think they need to take to feel safe and to mitigate risk?

2. *Seek information/advice from on-site staff/faculty*
   Identify and engage relevant partners abroad, such as a resident director or counterpart at the overseas institution, during your planning process (as part of your general emergency preparedness procedures) or during the assessment phase. Discuss perceived risks, both institutions' or organizations' risk "culture," resources to mitigate risks, communication protocols and emergency response plans. Understand that your partner abroad may have a different risk culture and a different perception of what constitutes a speedy response to a crisis than your institution or organization has. Understand also that there are both objective and subjective views of risk, so reviewing risks and how they will be managed when choosing a partner may help minimize your vicarious liability exposure (if you are offering a joint activity), and the potential public relations fallout for your partners perceived less-than-adequate decisions.

   Remember, too, that many of our colleagues abroad have been dealing with a variety of local risks, such as serious crime or certain, regular natural disasters, for a long time. Many of these institutions and organizations have developed sophisticated information networks, communication protocols and emergency plans, so you may not need to reinvent the wheel.

3. *Engage your peer network*
   Email the members in your peer network and let them know where you are in the assessment phase. Share your enrollment information and what you know about conditions in that area. Pose any relevant questions. Offer to compile replies or arrange a conference call among members. Ask members of your network to share any institutional decisions as soon as possible.

4. *Review, assess, revise and report*
   Referring to your enrollment data, compare student activities and program locations to the risks outlined in the Travel Warning (or other information that caused you to evaluate the program). Note any overlap and consider whether such risks can be reasonably mitigated by changing the program's location, postponing the program to a later date, altering a route on the itinerary, selecting a different mode of transportation, eliminating certain activities, adding staff, restricting student free time, enacting curfews (undesirable and often difficult, but not entirely impossible), etc.

   Recognize that there may not be a way to reasonably mitigate risk without compromising the academic goals of the program. If this is the case, you will need to share this during your meeting with key officials at your institution (*see* "step #6"). Remember, the goal is to manage risk to an acceptable level, not to eliminate it. Part of risk analysis is understanding how prepared the institution or organization is to respond to an emergency resulting from dangers/risks outlined in the Travel Warning.

   Consider the type and level of support available to reduce risk, such as access to staff resources in the affected area, long-standing ties to local institutions or organizations, and proximity to a U.S.

embassy, consulate and major airport. Also consider the participants' maturity, language proficiency, integration within the community, flexibility, accommodations and readiness to respond to emergencies.

Determine the possibility of imminent harm and the availability of "escape routes" as the likelihood of imminent harm increases. For example, in August of 2008, when the Russian army was advancing on Tbilisi, Georgia and the airport was closed, a Travel Warning was issued. The arrangement of U.S. government convoys to Yerevan, Armenia, indicated that that likely harm was imminent.

Allow room to change course if conditions change. Develop a list of tripwires that would trigger a subsequent review of the program or location. For example, any significant military engagement between Lebanon and Israel should trigger a review of programs located in cities near either border, such as Haifa or Beirut. Similarly, sustained roadblocks in and around the Nairobi International Airport would impede a group's ability to leave the country quickly, and should therefore trigger a review of all programs in central Kenya.

5. *Consult with government officials*
   Seek additional information from representatives of American Citizens Services in the U.S. DOS, the Research Information Support Center (RISC) at the Overseas Security Advisory Council (OSAC), and the Regional Security Officer (RSO) or Assistant Regional Security Officer (ARSO) at the local U.S. embassy or consulate. You can also contact the relevant Country Desk Officer at the U.S. DOS for assistance. For additional perspectives, review information from other governments' travel Web sites, such as Australia, Canada, Ireland, New Zealand, or the United Kingdom. [This isn't intended to imply that these countries have a superior intelligence gathering process, just that the resources are available in English].

6. *Call a meeting of key officials at your institution*
   Based on your institution/organization's suspension policy, decide if your institution/organization will: a) continue operating in spite of a Travel Warning with our without program modifications; b) suspend an existing program and ask students/faculty/staff to return home; and/or c) suspend the program before it starts.

   This step must involve a variety of stakeholders at your institution because it is critical for everyone to understand your institution's risk strategy, as everyone has a role in effective risk management. Your stakeholders may include, but are not limited to, the president/provost, governing board/board of trustees, and the offices of risk management, general counsel, international education/study abroad, undergraduate/graduate education, student health services, student life, campus police/security, and university/public relations.

   Topics for discussion should include: the data gathered in steps #2-5, the ability to assess risks (in general and during a specific crisis), the status of other institutions or organizations facing similar decisions, emergency preparation and response (including evacuation), and risk mitigation strategies (i.e., whether travelers are required to have international health insurance coverage, whether your underwriter covers claims occurring in a country with a Travel Warning, the amount and availability of emergency funds, the availability of travel interruption insurance due to a deterioration of the local infrastructure, etc.).

7. *Prepare talking points for all staff in your unit/office*
   Once your institution has made a decision and all relevant stakeholders have had a chance to provide input (recognize that your decision may vary among programs in the same country), work with colleagues in public relations and general counsel to craft a clear and concise message that outlines your due diligence. Be sure to include a reference to your withdrawal, suspension, and refund policies, and be prepared to respond to those who disagree with your position. For anyone charged with taking phone calls from students or parents, prepare a complete statement or at least a list of key phrases in advance. Pay as much attention to the process of communicating with stakeholders as you do to explaining the content of the information.

8. *Maintain daily monitoring*
   Commit to monitoring programs in affected locations on a daily basis. Review any incidents against your tripwires and modify your decisions or activities accordingly. Provide periodic updates to your stakeholders on the progress of the program and the status of participants. Continue with this step until the situation normalizes or the program ends, whichever comes first.

While this process may seem daunting, if you are starting from scratch be sure to tailor the plan to your institution. Eliminate steps or issues that are irrelevant to your institution, but also use this as an opportunity to engage in deeper partnerships with other campus officials who will participate in the process.

Conclusion

The issuance of a U.S. DOS Travel Warning presents numerous challenges to study abroad administrators. Regardless of the level of risk your institution is willing to bear, you need well-crafted policies and procedures to respond appropriately, keep internal and external stakeholders informed and, above all, to keep your travelers safe. Understanding the history and different elements of Travel Warnings and how they differ from Travel Alerts, Messages for U.S. Citizens and Consular Information Sheets is critical, as is building a peer network upon which you can rely before, during and after a crisis.

At the end the day, remember that no travel experience is risk-free. Some study abroad programs, due to their locations or activities, pose more risks than others. When strong review and response strategies are in place, it's possible to strike a balance between the extremes of absolute safety and absolute danger, so that your study abroad programs can be as fulfilling, rewarding and safe as possible.

Disclaimer

This paper is intended to provide advice and guidance to institutions or organizations interested in developing a review policy in response to U.S. Department of State Travel Warnings. It is not meant to be interpreted as setting new standards for the field of education abroad.

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References
- President George H.W. Bush's Statement on Signing the Aviation Security Improvement Act of 1990, November 16, 1990 - http://www.presidency.ucsb.edu/ws/index.php?pid=19048#axzz1koRdYT8G
- Aviation Security Improvement Act, Pub. L. No. 101-604 § 1, 109 Stat. 5732 (1990) – http://thomas.loc.gov/cgi-bin/query/D?c101:5:./temp/~c101uj18gP::
- *7 Foreign Affairs Manual* (FAM) 050 (Background on the Consular Information Program, Emergency (formerly 'Warden') Messages and the No Double Standard Policy) – http://www.state.gov/documents/organization/86560.pdf
- *U.*S. Embassy in Tokyo, Japan: Emergency (Formerly 'Warden') Messages – http://japan.usembassy.gov/e/acs/tacs-warden.html

Related Past Publications by Julie Friend
- *Learning from recent challenges in education abroad crisis management,* INTERNATIONAL EDUCATOR (Jan./Feb. 2012).
- *Danger ahead: assessing and mitigating risk*, INTERNATIONAL EDUCATOR SUPPLEMENT (Nov./Dec. 2011).
- *Travel warnings: developing effective response procedures*, INTERNATIONAL EDUCATOR SUPPLEMENT (Nov./Dec. 2010).

Additional Web Resources for Travel Warning Review and Policy Development

U.S. Government Resources
- The U.S. Department of State/Bureau of Consular Affairs – http://travel.state.gov/
- The U.S. Department of State Smart Travelers Enrollment Program – https://travelregistration.state.gov/ibrs/ui/
- The U.S. Department of State/Students Abroad – http://www.studentsabroad.state.gov/
- Overseas Security Advisory Council (OSAC) – http://www.osac.gov/
- Centers for Disease Control and Prevention (CDC) Travelers' Health – http://wwwnc.cdc.gov/travel/default.aspx
- Directory of U.S. Embassies and Consulates – http://www.usembassy.gov/

Other Government Resources

- Australian Department of Foreign Affairs – http://www.smartraveller.gov.au/zw-cgi/view/Advice/
- Canadian Department of Foreign Affairs and International Trade – http://www.voyage.gc.ca/index-eng.asp
- Irish Department of Foreign Affairs and Trade – http://www.dfa.ie/home/index.aspx?id=275
- New Zealand Ministry of Foreign Affairs and Trade – http://www.safetravel.govt.nz/advisories/index.shtml
- United Kingdom Foreign Office & Commonwealth Consular Reports – http://www.fco.gov.uk/en/travel-and-living-abroad/

Subscription Security Services
- ASI Group – http://www.airsecurity.com/
- Control Risks – http://www.controlrisks.com/
- Eurasia Group – http://www.eurasiagroup.net/
- Exclusive Analysis (UK) – http://exclusive-analysis.com/
- G4S Global Intelligence System – http://www.g4s.com/
- I-Jet Intelligent Risk Systems – http://www.ijet.com/index.asp
- Stratfor – http://www.stratfor.com/

Insurance and Risk Management
- Arthur J. Gallagher – www.ajgrms.com/highereducation
- CISI: Cultural Insurance Services International – http://culturalinsurance.com/
- FrontierMEDEX – http://www.frontiermedex.com/
- Global Rescue – https://www.globalrescue.com/index.cfm
- HTH Worldwide – http://www.hthworldwide.com/
- International SOS – http://www.internationalsos.com/en/
- Kroll & Associates – http://www.kroll.com/
- On-call International – http://www.oncallinternational.com/
- Travel Guard – http://www.travelguard.com/
- United Educators – https://www.ue.org/home.aspx

Organizational/Institutional
- Association for Safe International Road Travel (ASIRT) – http://www.asirt.org/
- Council on International Educational Exchange (CIEE) – http://www.ciee.org/
- IES Abroad – https://www.iesabroad.org/IES/home.html
- State or Regional College/University organization, such as the Committee for Institutional Cooperation (CIC) – http://www.cic.net/Home.aspx

Other Useful Resource
- NAFSA's Health and Safety Subcommittee Travel Warning Institutional Policy Survey (May 2011) – http://www.nafsa.org/resourcelibrary/default.aspx?id=26736

Associations
- The Forum on Education Abroad (See Good Practices, esp.) – http://www.forumea.org/
- NAFSA: Association of International Educators (see Standards, esp.) – http://www.nafsa.org/

- NASPA: Student Affairs Administrator in Higher Education – http://www.naspa.org/
- National Association of College and University Attorneys (NACUA) – http://www.nacua.org/
- National Association of College and University Business Officers (NACUBO) – http://www.nacubo.org/
- University Insurance and Risk Management Association (URMIA) – https://www.urmia.org/urmia.cfm
- International Association of College Law Enforcement Administrators (IACLEA) – http://www.iaclea.org/
- National Association of Public and Land Grant Universities (APLU) – https://www.aplu.org/
- The International NGO Safety and Security Association (INSSA) – http://ingossa.org/