International Travel Compliance

Patrice Gremillion

Accounts Payable & Travel

International Travel Compliance

- International travel compliance is not a single approval or form; it is an evolving, coordinated process that begins before travel and continues after the traveler returns.

- As the state legislative requirements continue to evolve, we have continued to strengthen LSU's international travel compliance processes through enhancements to Spend Authorization Questionnaire (SAQ), policy updates, revised forms, and improvements to approvals and reporting procedures.

International Travel Compliance

July 1, 2026, PM-13 Travel Policy Update

- Entity Head of each higher education institution, or designee, must approve all international travel (as defined in PM-13) prior to the departure date.
  - Each campus designated an **Entity Head approver** to support the approval process
  - Each campus Appendix B in PM13 was updated to include the position/title for the individual assigned the Entity Head designee.

With the Entity Head designee approval in place -

- Identified the need to incorporate Research Compliance Review into the approval workflow for all international travel (as defined in PM-13), rather than limiting the review to high-risk travel or travel to foreign adversary countries.
- **Research Compliance approval** was added on the Spend Authorization business process as a required approval step before final approval by Entity Head designee.

October 1, 2026, PM-13 Travel Policy Update

- Each campus Appendix B in PM-13 was updated to include the position/title for the individual assigned the Research Compliance Approver

International Travel Compliance

- **Foreign Adversary Countries:**
  - **China** – People's Republic of China, including Hong Kong and Macau (U.S. Department Travel Advisory Level 2)
  - **Cuba** – Republic of Cuba
  - **Iran** – Islamic Republic of Iran
  - **North Korea** – Democratic People's Republic of Korea
  - **Russia** – Russian Federation
  - **Venezuela** – Specifically, the Nicolás Maduro regime

- Employees planning travel to a foreign adversary country are encouraged to submit their travel requests as early as possible once the travel is known.

- Early submission allows sufficient time for the required reviews, approvals, and any additional compliance measures to be completed before departure.

International Travel Compliance

During the 2026 legislative session, **Research and Education Protection Act of 2026 (Act 505),** was approved and will become effective **January 1, 2027.**

Act 505 builds upon existing legislative requirements by establishing additional requirements for higher education to protect research and educational systems from foreign adversary influence.

Key provisions affecting international travel:

- **Transportation and Lodging:** Prohibits employees, researchers, and volunteers from accepting transportation or lodging in a foreign adversary country paid for by a foreign adversary or foreign adversary source under the circumstances specified in the law.
- **Gifts and Items of Value:** Prohibits accepting gifts or items of value from a person representing a foreign adversary, including payment of travel expenses or reimbursement for conference and event costs.
- **Reporting Requirements:** Requires employees, researchers, and volunteers to report certain interactions, communications, or meetings with individuals acting on behalf of a foreign adversary within 30 days.

International Travel Compliance

To support compliance with **Act 505,** we are working on the following:

1. **High-risk travel forms have been updated and are currently in final review:**
   - Traveler's Acknowledgment Section
   - Research Compliance Section
     - Detailed questions to support the research compliance review and approval

2. **Update PS-17, International Travel policy**
   - Research Compliance & Entity Head designee Approvals
   - Elevated Risk Locations that would require high-risk approval
   - Clarifications in support of travel, safety, and security

3. **Communication**
   - Employees who have traveled to foreign adversary countries from July 2024 through the present will be notified of Act 505 and additional restrictions that become effective **January 1, 2027.**
   - Cost Center Managers and Department Heads will be copied on the email notification

International Travel Compliance

Update to high-risk travel forms:

Traveler's Acknowledgments

By signing the request, I acknowledge that I understand and agree to comply with LSU institutional guidelines and applicable state and federal laws and regulations concerning travel to countries subject to sanctions or other government restrictions.

As set forth in R.S. 17:1828.6, I further acknowledge that:

- I may not accept any gift, honorarium, or other item of value from a person representing a foreign adversary for any purpose, including payment of travel expenses, reimbursement of costs associated with attending a conference, or compensation for participation in an event in a country that is a foreign adversary.

- I must disclose any interaction, communication, or meeting with a person acting on behalf of a foreign adversary no later than 30 days after the date of the interaction.

1.

A Collaborative Effort – Thank You!

- Compliance is a shared responsibility, and departmental oversight is an essential part of the process. We appreciate your continued partnership, attention to detail, and commitment to helping LSU meet these important requirements.

- Collaboration among AP & Travel, Central Support, the International Travel Oversight Committee (ITOC), the Office of Academic Affairs, the Office of Global Engagement, the Office of Research & Economic Development, the Office of Risk Management, the Office of General Counsel, and our other campus partners has been instrumental in advancing **LSU's International Travel Compliance Program**.

- **THANK YOU** for your partnership, collaboration, and commitment to advancing our collective efforts!