

Putting ERM to Work: A Tale of Managing International Travel Risk

Christine Packard
Assistant Vice President, Enterprise Risk Management
University of Massachusetts



Learning Objectives

- Identify the challenges in managing international travel risk
- Identify strategies for managing international travel risk
- Learn how to leverage your ERM
 Program to help manage travel risk

Agenda

- Duty of Care and Its Evolution in Higher Education
- Case Study: The Role of ERM in UMass' Development of a University Travel Risk Management Program
- Key Take-Aways



What is Duty of Care for International Travel?

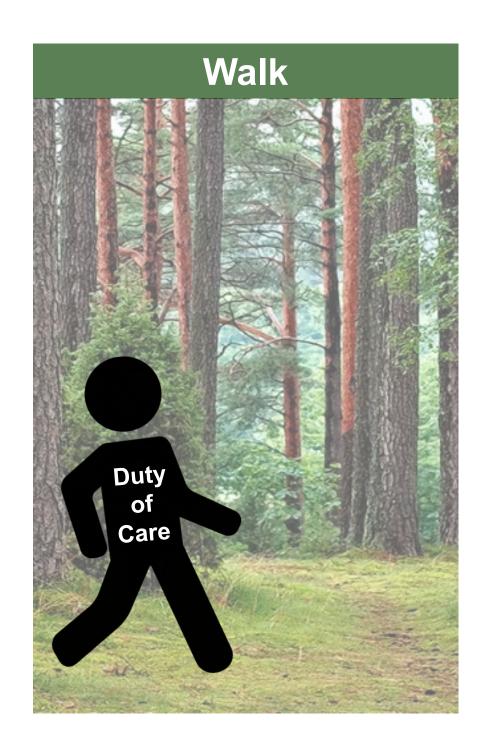
Duty of Care for international travel is the legal and ethical **responsibility** of **organizations** (especially employers, schools, and institutions) to **protect** the **health**, **safety**, and **well-being** of their employees, students, or representatives while they are **traveling abroad** for **work**, **official** or **academic purposes**.



Duty of Care Evolution in Higher Education

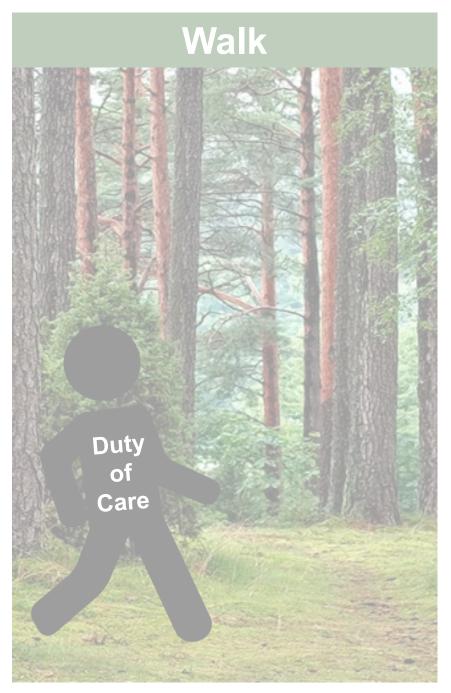






2000's

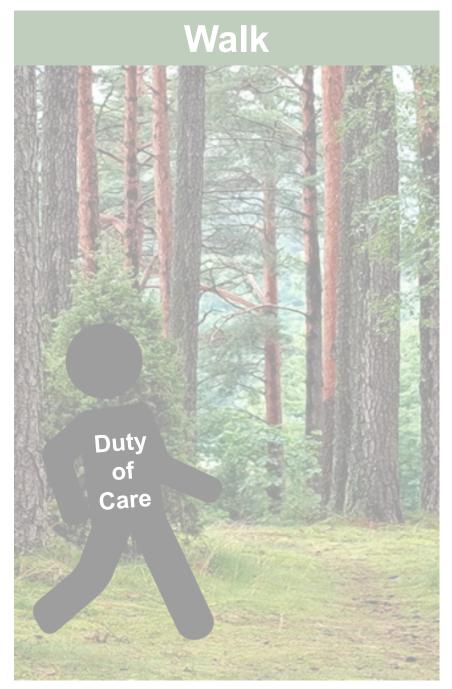
International travel risk management generally grows as a body of work



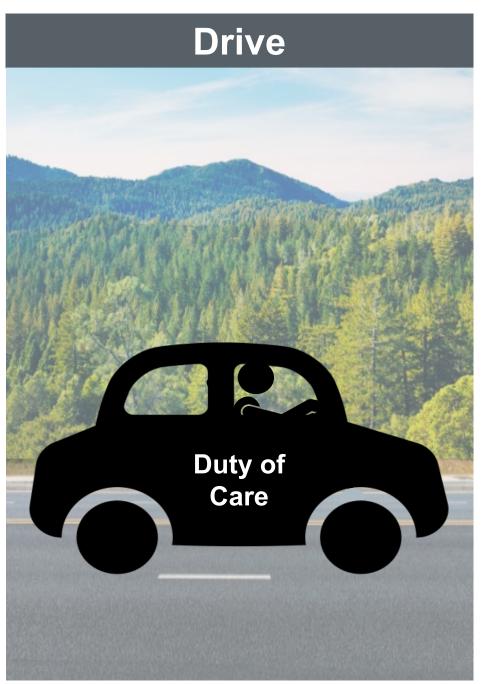


2010's

- International Risk Management develops as a professional field in higher education
- Organizations such as the International Safety and Security Professionals in Higher Education (PULSE) is established



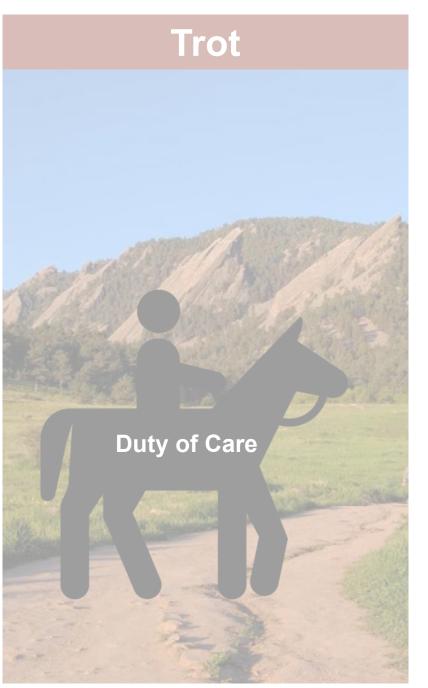


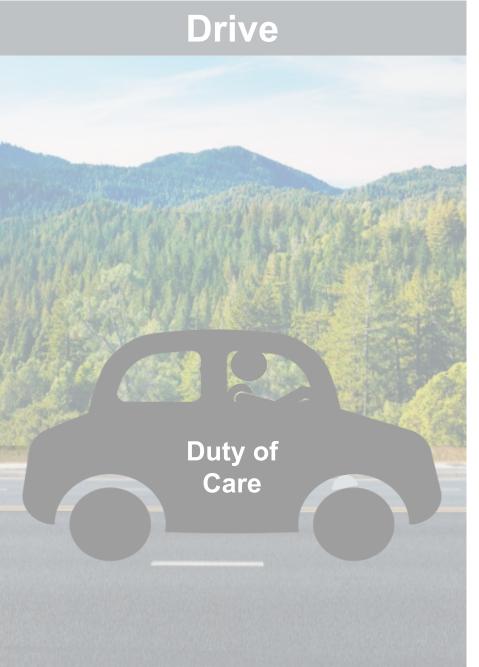


2020's

- Increase in formal travel risk management programs
- Release of ISO 31030
 Travel Risk
 Management
 Guidance (2021)









ISO 31030 Travel Risk Management Concepts

ISO 31030 is not a separate philosophy from ISO 31000 (ERM) but rather is a practical application of ISO 31000's principles to travel-related risk

Leadership, Governance & Policy

- Obtain leadership commitment/buy-in to implement travel risk management program and principles
- Establish governance with defined roles and responsibilities
- Develop formal travel policy that addresses high-risk travel, risk appetite and duty of care responsibilities

Context & Scope

- Consult stakeholders
 in the development of both the policy and the program
- Understand
 internal/external
 factors, set clear
 travel-risk scope and
 identify stakeholders

Risk Assessment & Mitigation

- Develop a travel risk management program that includes risk assessment and risk mitigation
- Identify, analyze, and evaluate travel-related risks for travelers (health and safety) and the institution (cybersecurity)
- Implement a methodology to track travelers (travel registry)
- Ensure travelers have
 24/7 access to
 assistance
- Ensure capabilities to monitor and respond to travel emergencies and incidents

Operational Process

- Design and implement a travel request review process that considers risk
- Require travelers to register their itinerary in advance of travel
- **Brief travelers** on high-risk destinations
- Ensure travelers have access to pre-travel briefings (as needed), health and safety guidance, and countryspecific advisories

Communication & Consultation

- Ensure capabilities to communicate with travelers during travel
- Ensure travelers can be alerted to emergencies or changing conditions impacting their travel destination

Document, Monitor & Review

- Continually evaluate travel risk management program and make adjustments or enhancements as needed
- Continually assess
 risk and make
 enhancements or
 adjustments to risk
 mitigation as needed
- Provide opportunity for travelers to provide feedback
- Maintain up-to-date records



Role of ERM in Travel Risk Management

- 1. Helps define risk and enables a consistent approach to *risk* assessment
- 2. Helps bring *visibility* to and *prioritize* the risk
- 3. Facilitates *defining risk appetite* (what do we allow/not allow) and *risk tolerance* (what do we allow with appropriate mitigation measures)
- 4. Enables consistency in design and implementation of *mitigation* strategies



Case Study: Role of ERM in Developing UMass' Travel Risk Management Program



About UMass

UMass became a University System in 1991

Ranking #1 Public University in New England

Campuses Five undergraduate & graduate

Students 75,000 students

New Graduates 20,000 annually

• 330,000 in MA

• 530,000 worldwide

Employees • 26,000 employees

3rd largest employer in MA

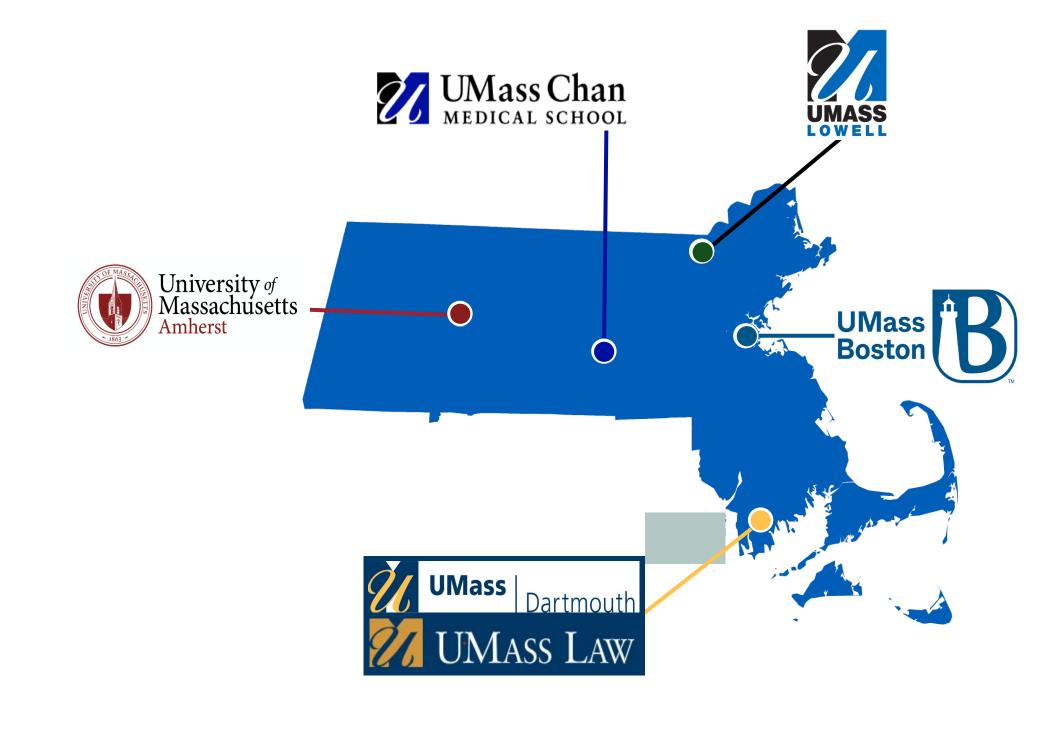
Research \$813M

• 3rd largest in MA

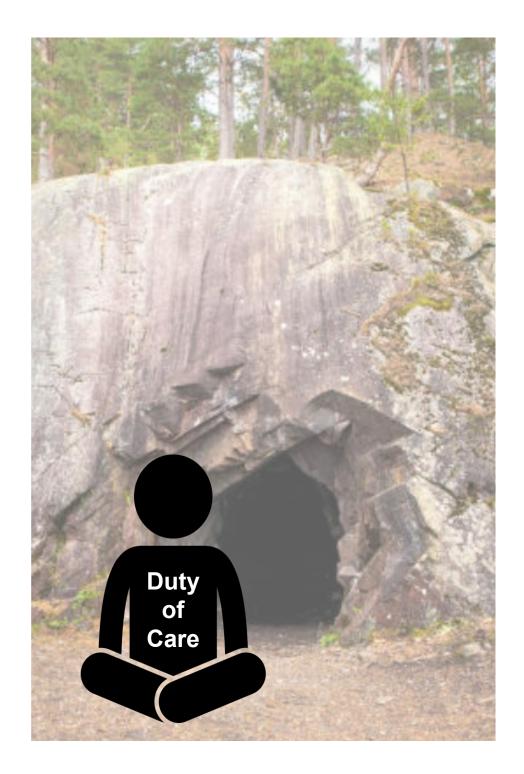
4th largest in New England

Budget \$4.3B annually (FY26)

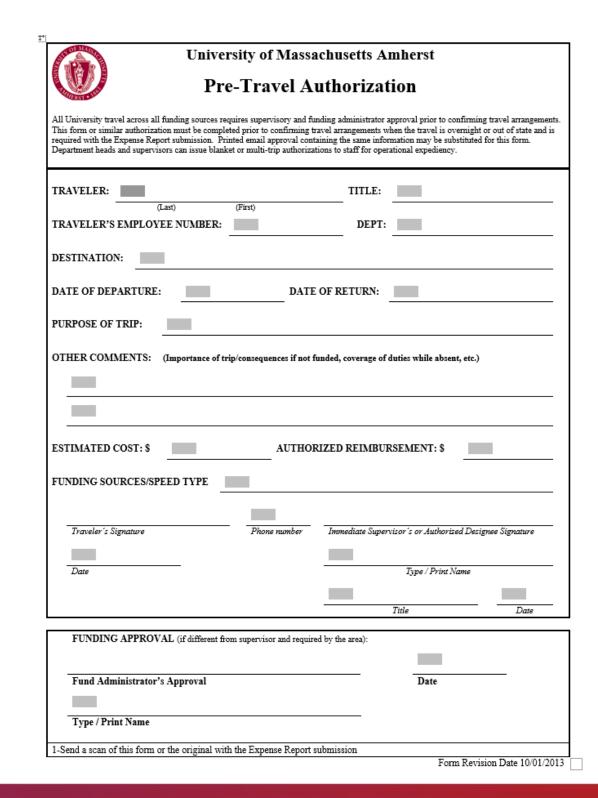
Economic Impact \$8.3B across Massachusetts



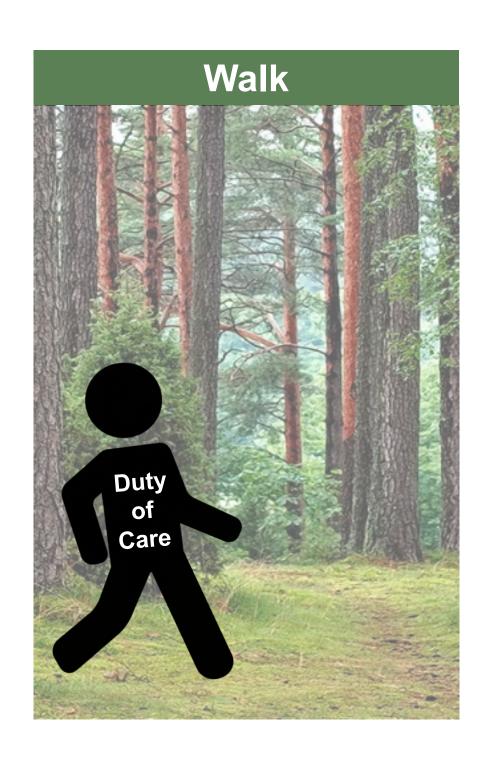
Travel Program: 2000's



- Policies focused on travel expenses only
- Travel authorization requirements varied across university system
- Travel request review, approval and documentation was decentralized, paper-based and focused primarily on costs associated with travel
- Generally, little to no risk review
- Travelers obtained their own travel accident and sickness insurance



Travel (Risk Management) Program: Early 2010's



- Obtained travel accident and sickness insurance
- UMass Amherst hires first-ever full-time dedicated International Travel Safety Advisor
- UMass Amherst launches an online platform to manage Study Abroad
 - UMass system subsequently expands this online platform to all UMass undergraduate campuses
 - This serves as a foundational element for future overall travel risk program maturation

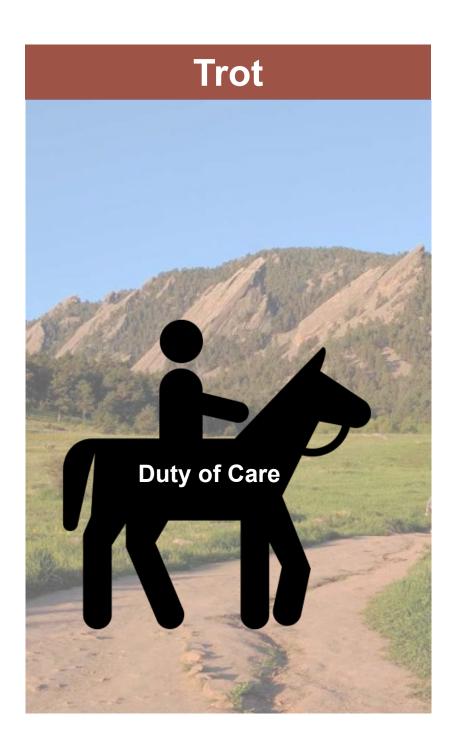
Global Activity 2014 - 2017

- Significant militant activity in Africa, Asia and Middle East
- Significant terrorism activity in Europe and US:
 - Belgium (Brussels)
 - France (Paris, Nice)
 - Germany (Berlin)
 - United Kingdom (Manchester, London)
 - United States (California, Florida, New Jersey, New York)
- Large-scale natural disasters
 - Ecuador (earthquake)
 - Caribbean (hurricanes)
 - Nepal (earthquake)
 - US (hurricanes)

Please note: this is not intended to be an exhaustive list of incidents and activities



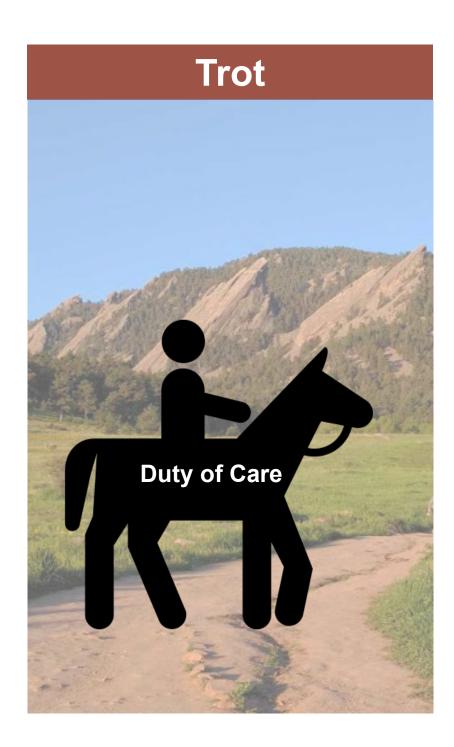
2017



- University purchased and implemented risk/travel registry platform for all campuses
- University required registration of all out-of-state domestic and international travel

Current Itinerary:		
Date of Departure to Destination:	mm/dd/yyyy	
Date of Return from Destination:	mm/dd/yyyy	
Location/Destination:	Find location: enter city name here to find location	
	'Akko, Israel (Middle East) Aachen, Germany (Europe) Aalborg, Denmark (Europe) Aarhus, Denmark (Europe) Aberdeen, United Kingdom (Europe) Aberdeen, MD, United States (North America) Abingdon, VA, United States (North America) Abo, Finland (Europe) Abu Dhabi, United Arab Emirates (Middle East) Accra, Ghana (Africa) Acton, MA, United States (North America)	

2017



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Initial Travel Registry

Successes	Limitations
 Recorded general destinations and dates of travel Searchable based on campus, traveler name or destination 	 Travel registration required prior to obtaining travel authorization Static information Destinations were pre-programmed into a static list Did not record modifications to or cancellation of travel Query generated static list of travelers, dates of travel and destinations (as recorded)
 Facilitated some degree of risk review Used as a pre-travel authorization platform for some campuses 	 Campus-by-campus customization, enabling inconsistent approach to risk review Did not provide risk information on destination to travelers or travel risk managers Reliance on Amherst campus (only dedicated travel risk staff) for identifying countries that posed risk to travelers No ability to communicate with travelers through platform
Prompted systemwide collaboration and information-sharing through regular meetings among those with travel risk management roles	Meetings often focused on technical management of the platform



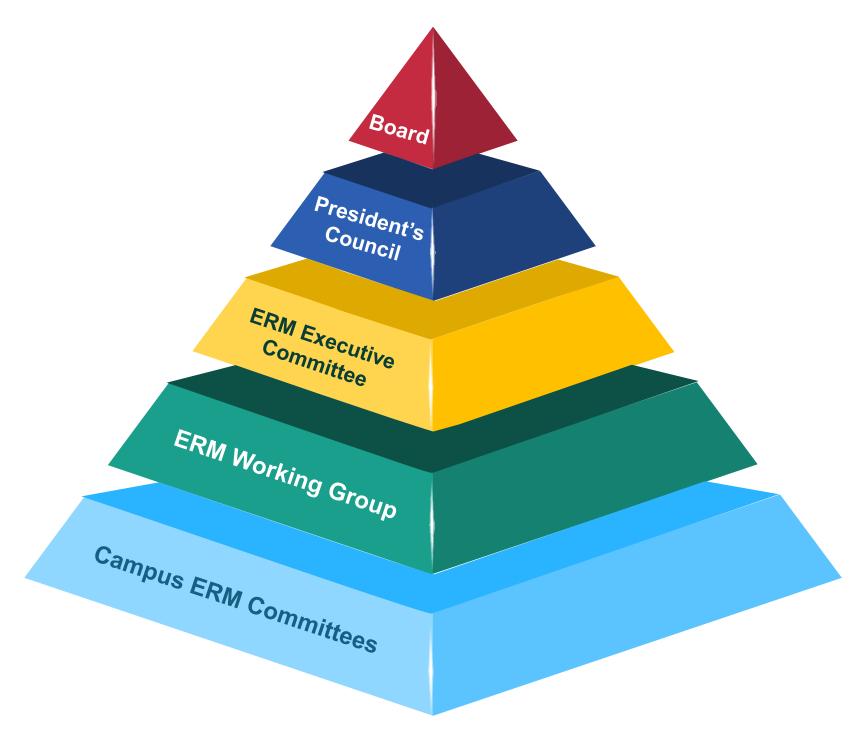
Enter ERM





UMass Systemwide Enterprise Risk Management Program

Formal Governance Structure



Two-Year Program Cycle



Role of ERM in Travel Risk Management



1. ERM helps define the risk and enables a consistent approach to risk assessment



ERM Asks: What are we worried about?

- Health, safety and well-being of travelers
- Protecting the University, its data, and its assets
- Ensuring compliance

UMass ERM Program Risk Assessment Risk Factors

Risk Factor	Risk Factor Question	Assessed by
<u>Likelihood</u>	What is the likelihood the University system could experience this risk?	ERM Working Group
Consequence	To what degree would the University system be impacted by this risk? • Operations • Financial • Legal/Compliance • Workforce • Reputation • Lifesafety	ERM Working Group
		FRM Executive

UR.

How soon does the University need to prioritize this risk?

RM Executive Committee

International Activities Risk Assessment

Risk Name	Risk Definition	Likelihood	Operations	Financial	Legal/ Compliance	Workforce	Reputation	Life Safety	Urgency
International Activities	Inability to effectively implement a consistent approach across the University system to manage and support international activities, including University travel, University devices, data and intellectual property, students, employment, trade and sanctions, and business engagements.	High	Low	Low	Medium	Low	Medium	Negligible	Moderate
a. University Travel	Inability to effectively implement a consistent approach across the University system to manage risk associated with international University Travel.	High	Low	Negligible	Low	Low	Medium	High	
b. Devices, Data and Property Management	Inability to effectively implement a consistent approach across the University system to protect intellectual property, UMass devices, data and data systems as they relate to international travel and activities.	High	Medium	Low	Medium	Low	Medium	Negligible	
c. Students	Inability to effectively implement a consistent approach across the University system to comply with immigration rules and regulations and tax requirements associated with international students.	High	Low	Low	Medium	Low	High	Negligible	
d. Employment in US	Inability to effectively implement a consistent approach across the University system to employ non-US candidates for positions in the US in compliance with immigration and tax requirements.	High	Medium	Low	Low	Medium	Medium	Negligible	
e. Employment outside US	Inability to effectively implement a consistent approach across the University system to hire staff located in international locations and compliance with associated immigration and tax requirements.	High	Low	Negligible	Medium	Negligible	Low	Negligible	
f. International Trade and Sanctions Compliance	Inability to effectively implement a consistent approach across the University system to comply with international trade requirements and sanctions.	High	Medium	Low	Medium	Negligible	Medium	Negligible	
g. Business Operations	Inability to effectively implement a consistent approach across the University system to engage in international business operations, including but not limited to procurement, operations, and online education of individuals in international locations, in compliance with international and US rules, regulations and tax requirements.	High	Low	Low	Medium	Negligible	Low	Negligible 25	

International Activities Risk Assessment

Risk Na

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Defined risk

a. Uı

b. De Pro

f. Int Sa



Consistently assess risk exposure

with international and US rules, regulations and tax requirements

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Role of ERM in Travel Risk Management



2. ERM can bring visibility to and help prioritize a risk



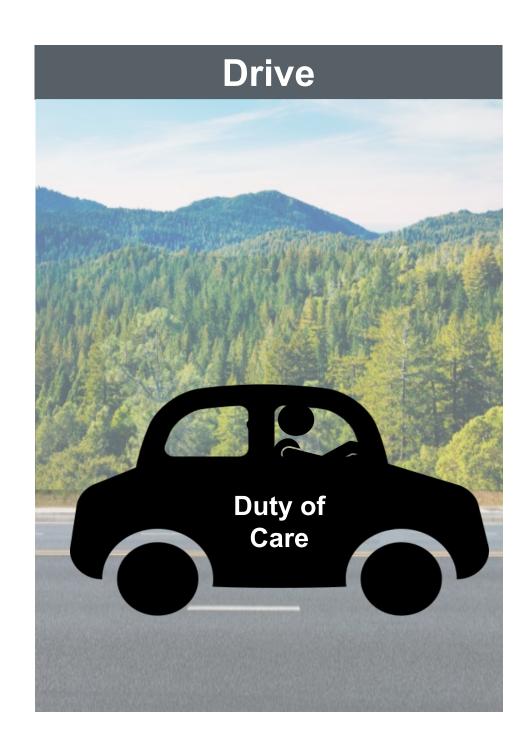
UMass Risk Registry Top Risks

FY22

Rank	Risk
1	Enrollment
2	Information Security
3	Financial Sustainability
4	Facilities and Deferred Maintenance
5	Student Health and Mental Health Support
6	Vendor Risk Management
7	Attract, Recruit, Retain Faculty and Staff
8	International Activities
9	Information Privacy
10	Diversity, Equity and Inclusion

Rank	Risk
1	Enrollment
2	Information Security
3	Facilities and Deferred Maintenance
4	Financial Sustainability
5	Student Health and Mental Health Support
6	Artificial Intelligence
7	International Activities
8	Research
9	Diversity, Equity, Inclusion and Accessibility
10	Attract, Recruit, Retain Faculty and Staff

Leveraging Risk Visibility



- Systemwide effort to update Board level procurement, travel and expense-related policies (2020)
 - ERM added to the project to represent risk related to travel risk management
 - Existing travel policy focused on expenses, not risk
 - Pulled all content into new Business and Travel Expense Policy
 - When new Business and Travel Expense Policy was approved, the former travel policy was rescinded (December 2021)
- Opportunity to develop a new travel policy to address travelrelated risk



Leveraging ERM for Travel Policy Development

- ERM appointed lead for development of new travel policy
- Leveraged travel risk manager group to form a systemwide policy development team
- Used ERM definition of systemwide International Activities risk to identify areas to address through new policy
 - University Travel
 - Travel with University Devices/Data
 - Compliance with Sanctions



Role of ERM in Travel Risk Management



3. ERM can facilitate defining:

- Risk Appetite: What will we allow and not allow?
- Risk Tolerance: What will we allow with appropriate mitigation measures in place?

Travel Policy Development: Defining Risk Appetite and Risk Tolerance

	University Travel	Travel with Devices/Data	Trade and Sanctions Compliance
Risk Appetite	Restricts travel to high-risk destinations	 Restricts travelers from bringing University devices or data on travel to elevated cybersecurity risk destinations Restricts travelers from accessing University data or systems during on travel to elevated cybersecurity risk destinations Restrictions pertain to University travel and personal travel 	 Assigns responsibility for export control compliance to university Assigns responsibility for obtaining federal licenses to travel to sanctioned destinations
Risk Tolerance	Authorizes campuses to permit travel to high-risk destinations when appropriate mitigation measures can be achieved	Authorizes campuses to permit bringing devices or data or accessing data or systems when appropriate mitigation measures can be achieved	



Role of ERM in Travel Risk Management



4. ERM enables consistency in the design and implementation of mitigation strategies

Travel Policy Development: Instituting Consistent Mitigation Measures

University Travel

- Requires pre-approval and registration of all University Travel
- Codifies consistent approach to reviewing high-risk travel
- Requires campuses to provide travel risk information
- Requires travelers to obtain travel risk information
- Cites University Travel Accident and Sickness Insurance Coverage

Travel With University Devices/Data

- Requires campuses to review requests to bring University devices or data on travel to elevated cybersecurity risk destinations
- Requires travelers to obtain authorization to bring University devices or data on university and personal travel to elevated cybersecurity risk destinations

Compliance with Sanctions

- Requires campuses to conduct export control review of all international travel requests
- Requires travelers to obtain required license from the U.S. Office of Foreign Assets Control for travel to a comprehensively sanctioned destination



Mitigation Resources: Designating High-Risk & Elevated Cybersecurity Risk Destinations

Travel Policy establishes systemwide Travel Risk Advisory Committee (TARMAC)

- Includes representation from all campuses and President's Office
 - ERM appointed by committee as chair
- Authorized to designate criteria to determine what destinations pose a high degree or risk and/or an elevated cybersecurity risk
 - Destinations that meet criteria become designated as high-risk and/or elevated cybersecurity risk destinations
- Meets quarterly and as needed



TARMAC Criteria

	Source	Level	Rating Applicability
	US Department of State	4	Countrywide or regional
	US Department of State	3	Countrywide or regional
	Healix	5	Countrywide or regional
High-Risk Destination	Healix	4	Countrywide or regional
Destination	Centers for Disease Control & Prevention	4	N/A
	Centers for Disease Control & Prevention	3	N/A
	Office of Foreign Assets Control	NA	All comprehensively sanctioned countries
Elevated	US Department of State	4	Countrywide
Cybersecurity Risk	National Security Presidential Memorandum (NSPM)-33	NA	All countries defined in NSPM-33 as a "Foreign Country of Concern"
Destination	Office of Foreign Assets Control	NA	All comprehensively sanctioned countries



High-Risk and Elevated Cybersecurity Risk Destinations

- ERM Program maintains a <u>published list</u> of destinations that meet TARMAC Criteria
- Updated at the beginning of each month and as needed

Country	Meets TARMAC High Risk Destination Criteria	Meets TARMAC Elevated Cyber Risk Criteria	Healix Countrywide or Regional Level 4 or 5	US Department of State Level 3	US Department of State Level 4	CDC Level 3 or 4	Comprehensively Sanctioned Country	Encryption Restrictions	NSPM-33 Country of Concern
A High-Risk Destination is any domestic or international country, region, province or city designated by the Systemwide Travel Risk Management Advisory Committee (TARMAC), or a campus, as posing substantive health, safety, security risk to a University Traveler and/or the University.	TARMAC High-Risk Destination Criteria	TARMAC Elevated Cybersecurity Risk Destination Criteria	Healix Risk Information	US Department of State Travel Advisories	US Department of State Travel Advisories	CDC Travel Health Notices	Country is comprehensively sanctioned	Country has significant restrictions on encryption	National Security Presidential Memorandum (NSPM)-33 identifies the country as a country of concern
(A)	Meets TARMAC High Risk Destination Criteria	Meets TARMAC Elevated Cyber Risk Criteria	Healix Countrywide or Regional Level 4 or 5	US Dept of State Level 3	US Dept of State Level 4	CDC Level 3 or 4	Comprehensively Sanctioned Country	Encryption Restrictions	NSPM-33
Afghanistan	Yes	Yes	C	No	<u>C</u>	No	No	No	No
Albania	No	No	No	No	No	No	No	No	No
Algeria	Yes	No	No	No	<u>R</u>	No	No	No	No
American Samoa	No	No	No	No	No	No	No	No	No
Andorra	No	No	No	No	No	No	No	No	No
Angola	Yes	No	R	No	No	No	No	No	No
Anguilla	No	No	No	No	No	No	No	No	No
Antarctica	No	No	No	No	No	No	No	No	No
Antigua and Barbuda	No	No	No	No	No				No
Argentina	No	No	No	No	No	KEY			No
Armenia	Yes	No	R	No	<u>R</u>	Last updated 10/3/2025			No
Aruba	No	No	No	No	No	C = Countrywide Rating			No
Australia	No	No	No	No	No	R = Regional Rating			No
Austria	No	No	No	No	No	Country is designated as a high-risk destination but			
Azerbaijan	Yes	No	R	No	No		agnated as a night d cybersecurity ri		No
14 i						Country is des	signated as an ele	vated cybersecur	ity
						_	n, but not a high-r	-	





Country is designated as both a high-risk and an

elevated cybersecurity risk destination

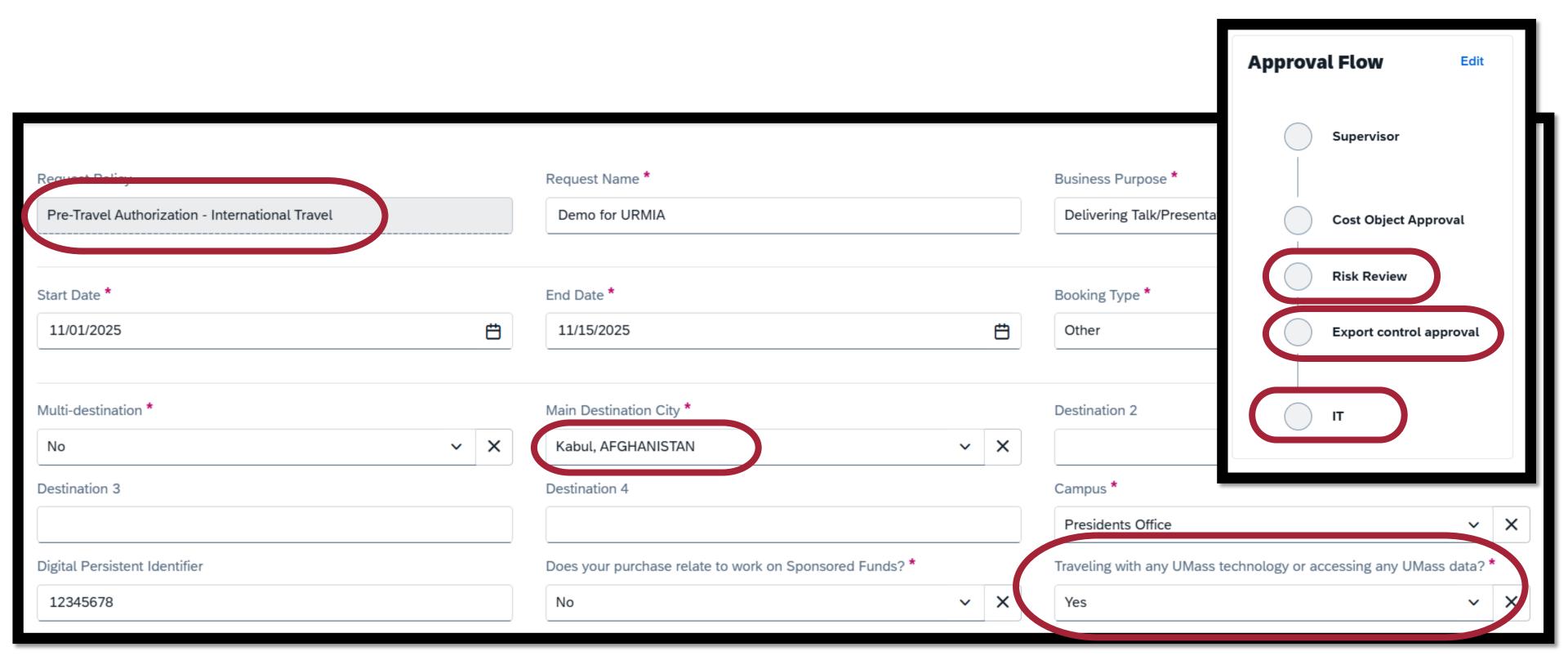
Resources to Support Implementation of Mitigation Measures



- Obtained enhanced travel accident and sickness insurance coverage and services
- Implemented systemwide platform for management of travel and expense
 - Travel risk managers collaborated to design the configuration of risk review
 - Automatically triggers risk review for high-risk destinations
 - Triggers IT review for elevated cybersecurity risk destinations
- Implemented enhanced Travel Registry
 - Travel risk managers collaborated on selection of platform



Pre-Travel Authorization Request for International University Travel



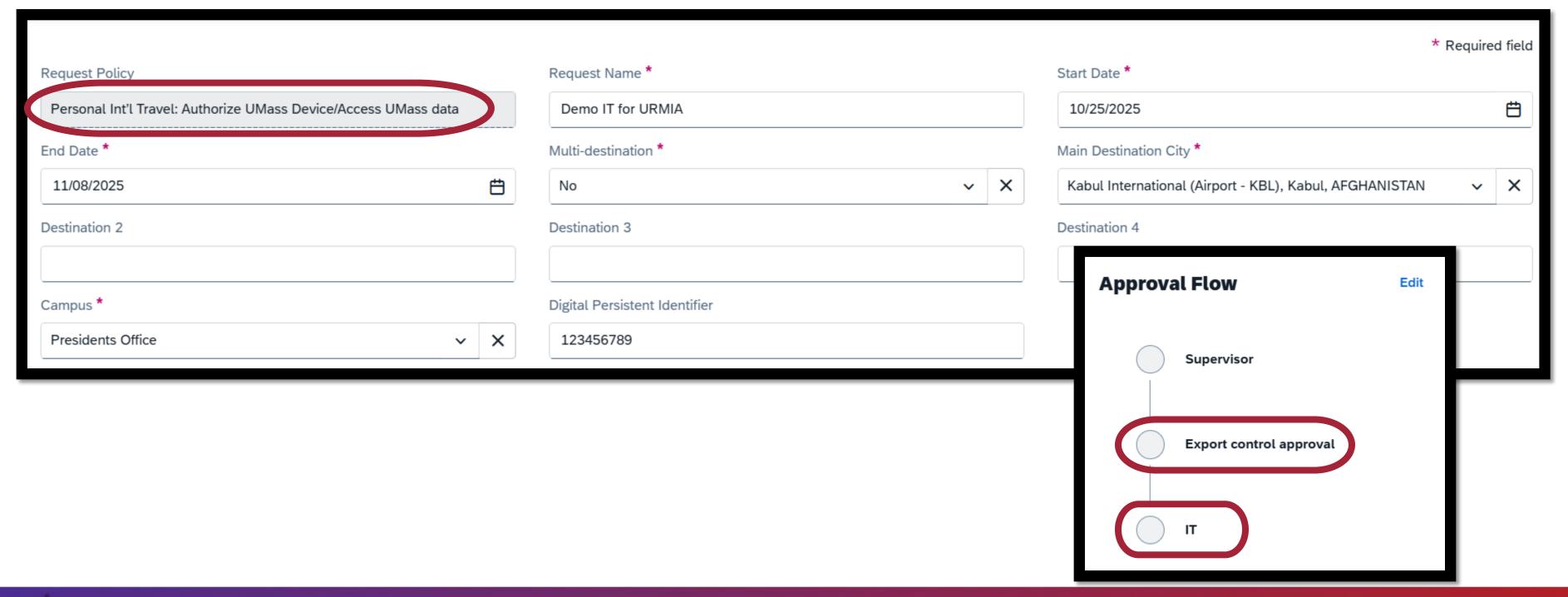


International Risk and Export Control Form

- Every campus requires the completion and attachment of an <u>International</u> <u>Risk and Export Control Form</u> to an international travel authorization request
 - Traveler provides risk information (traveler familiarly with destination, in-country contact information, emergency contact information, etc.)
 - Traveler acknowledges availability of university travel accident and sickness insurance coverage and services
 - Traveler discloses devices, equipment, materials traveler intends to bring on/access during travel



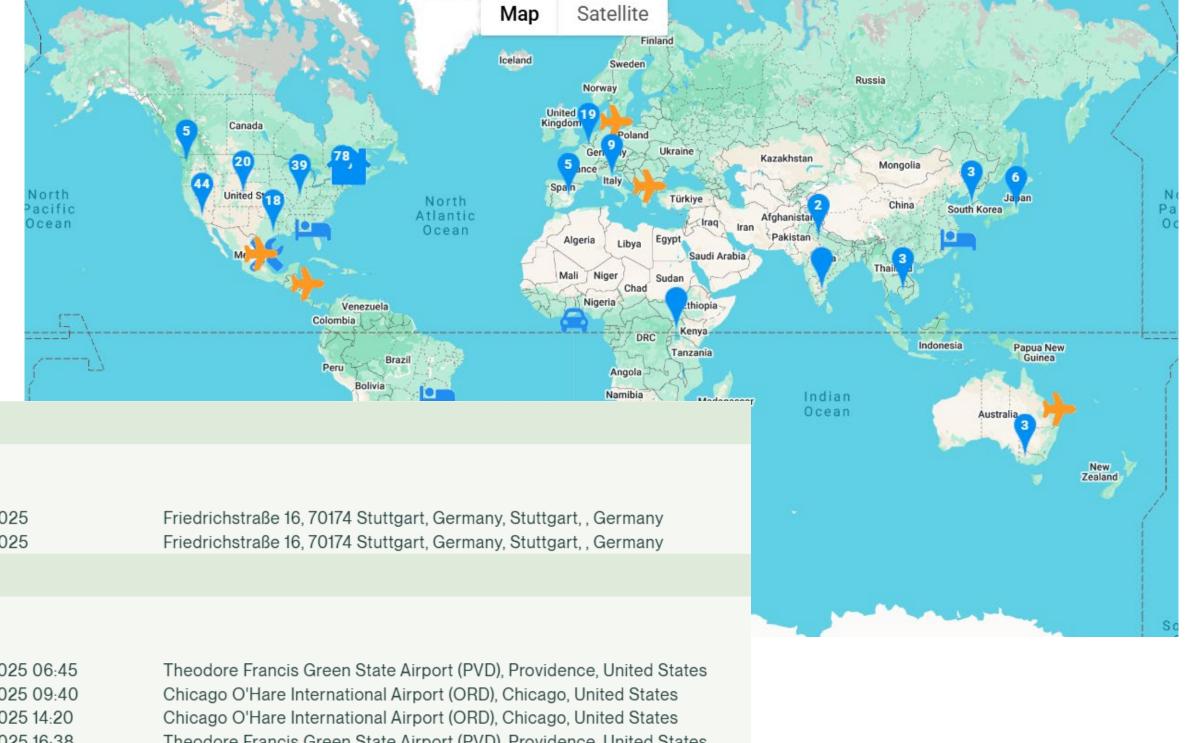
Pre-Travel Authorization Request to Bring University Device/Access University Data During Personal International Travel

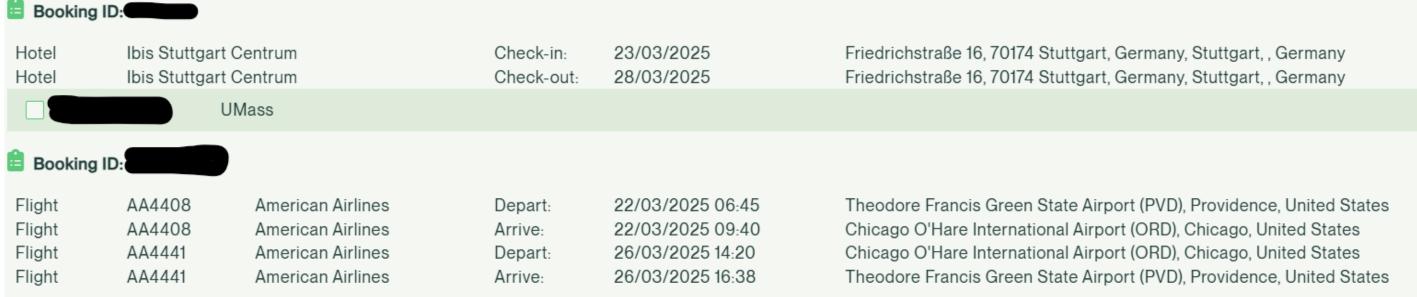


Enhanced Travel Registry Platform

- Identifies locations of travelers in real-time and near real-time
- Updates travel itineraries when changes to travel are made

UMass







Enhanced Communications Capabilities

Recent events both domestically and internationally have required outreach to travelers

Risk Manager Communications

- Provide incident alerts
- Notifies travel risk manager when incident may impact traveler

Traveler Communications

- Enables direct communicate with travelers through platform
 - Email, text, app

China, Hong Kong, Macao [Macau] - China/Hong Kong/Macau: Shelter-in-place through at least 24th September due to imminent passage of Typhoon Ragasa

and Zhuhai in China's Guangdong province by 24th September. A rapid deterioration in the security and operational risk environments is forecast for the next 24-48 hours due to flash flooding, storm surges, landslides if the strayeler of incidents when travel and/or damaging strong winds. Anticipate significant operational and travel disruption, including for road, train, ferry and air travel.

ncident Category: Security, Weather, Typhoon, Travel Disruption, APAC

Exposure

You may have 1 employee(s) travelling, impacted by this incident

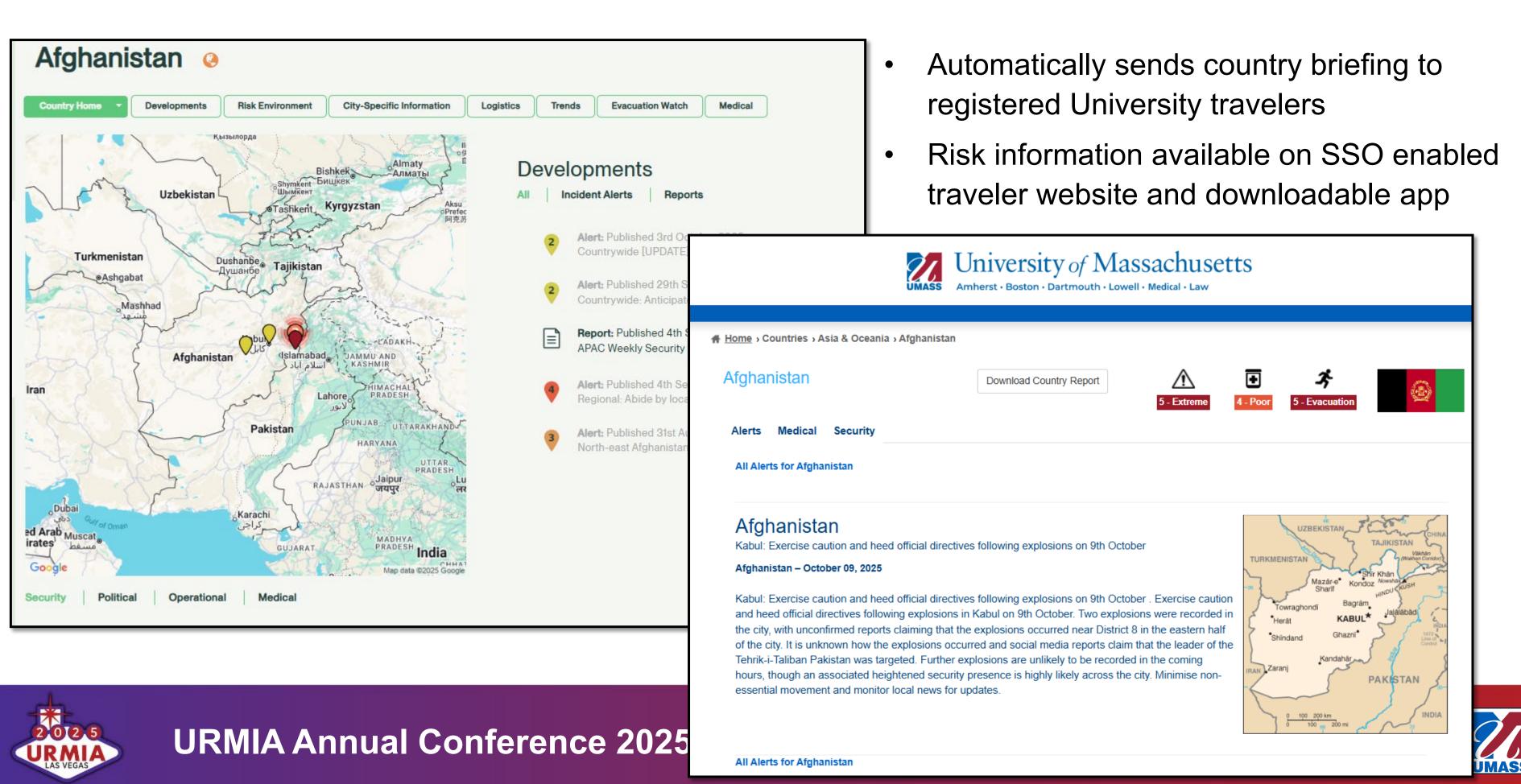
employee(s) are in location with current active location data



To view your staff exposure please click on the below link and enter your login details

Platform documents communications be impacted

Traveler Resources



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- ✓ Ensure capabilities to communicate with travelers during travel
- ✓ Ensure travelers can be alerted to emergencies or changing conditions impacting their travel destination

Document, Monitor & Review

- Continually evaluate travel risk management program and make adjustments or enhancements as needed
- ✓ Continually assess risk and make enhancements or adjustments to risk mitigation as needed
- Provide opportunity for travelers to provide feedback
- ✓ Maintain up-to-date records





Overall Success – But Not Without Challenges



- Substantive change in travel oversight (especially for faculty)
 - Increase in authority over travel review
 - Required to obtain multiple levels of approval
- Aligning configuration of technology to meet all campus needs
- Ensuring travelers comply with travel registration
- Ongoing administration of technology and resources

Mitigation measures enabled ERM Executive Committee to lower the prioritization of international activities

FY26 Risk Registry

Rank	Risk
1	Financial Sustainability
2	Enrollment
3	Research
4	Facilities and Deferred Maintenance
5	Diversity, Equity, Inclusion and Accessibility
6	Information Security
7	Student Health & Mental Health Support
8	Artificial Intelligence
9	Attract, Recruit, Retain Faculty and Staff
10	All-Hazards Planning and Response Capabilities
11	International Activities

Priority Risks







Take-Aways

- •ERM can be tangible (if you let it be)
- •ERM can provide more than risk assessment and risk ranking information (if you leverage it correctly)
- •ERM can facilitate incremental progress in managing risk

Questions?

Christine Packard

Assistant Vice President, Enterprise Risk Management
University of Massachusetts - President's Office
cpackard@umassp.edu



