



Research Security and  
Compliance

University of Missouri-Columbia

Standard Operating Procedure

RSC Review: International Travel Authorizations

## RSC Review: International Travel Authorizations

Effective Date: March 24, 2025  
Original Approval Date: March 24, 2025  
Revised Date: N/A

Approved By: Michele Kennett  
Associate Vice Chancellor for Research

### Table of Contents

Purpose

Scope

Responsibilities

Procedure

### 1.0 Purpose

The University of Missouri-Columbia (MU) is required to comply with export controls and sanctions regulations. International Travel Authorizations submitted via [ecompliance.missouri.edu](https://ecompliance.missouri.edu) undergo a risk-based review by Research Security and Compliance (RSC) at MU.

### 2.0 Scope

To optimize compliance with applicable U.S. export controls and sanctions regulations, this SOP establishes responsibilities for the RSC review and in some cases RSC approval of international Travel Authorizations submitted by MU travelers via [ecompliance.missouri.edu](https://ecompliance.missouri.edu).

### 3.0 Responsibilities

#### RSC responsibilities

- a. Identify specific travel risks and implement an automated routing, review, and in some cases approval process within the Travel Authorization. International travel risks are identified by RSC as Lower Risk, Higher Risk, and Comprehensively Sanctioned. RSC does not review domestic travel.
- b. Develop and implement questions in the Travel Authorization that identifies a traveler's destination, what the traveler is doing at the destination, and what the traveler is hand carrying or shipping to the destination.
- c. Develop risk-based guidance that is automatically provided to all travelers in response to their submission of an international Travel Authorization.
- d. Ensure that international Travel Authorizations receive a timely and risk-based review for export controls, sanctions, and research security risks.
- e. Review Higher Risk travel and communicate risks and compliance guidance to travelers, and their travel approver as needed. Ensure that travel, activities, and any exports related to Higher Risk travel are allowed under U.S. law or regulations
- f. Review and approve or deny travel to Comprehensively Sanctioned Destinations. Communicate risks and compliance guidance to travelers and their travel approver. Ensure that travel, activities, and any exports are allowable under U.S. law or regulations via an export license, an export license exception, or a no export

license required determination. For sanctions compliance, determine if a General License is available or if a Specific License is required under U.S. sanctions regulations.

#### Traveler Responsibilities

- a. Accurately complete the Travel Authorization for international travel as required by the [UM System Travel Authorization Policy Number: 22601](#)
- b. Engage with RSC on the review and when necessary, the RSC approval process. Comply with requirements related to export controls and sanctions compliance or other research security risks as required by RSC.

#### Travel Approver Responsibilities

- a. Engage with RSC on the review and when necessary, the RSC approval process. Support requirements related to export controls and sanctions compliance, or other research security risks as required by RSC.

### **4.0 Procedure**

#### Comprehensively Sanctioned Destinations

- a. Comprehensively Sanctioned Destinations include the following:
  - i. Cuba
  - ii. Iran
  - iii. North Korea
  - iv. Syria
  - v. Crimea, Luhansk, and Donetsk Regions of Ukraine
- b. Comprehensively Sanctioned Destination travel is reviewed and approved by RSC, prior to the international Travel Authorization moving to the traveler's travel approver.

#### Higher Risk Travel

- a. The following destinations are considered Higher Risk
  - i. Afghanistan
  - ii. Belarus
  - iii. Burma
  - iv. Cambodia
  - v. China
  - vi. Russia
  - vii. Venezuela
- b. The following international activity categories in the Travel Authorization are considered Higher Risk
  - i. Collaboration/Research
  - ii. Field Work/Site Visit
  - iii. Other
- c. The following export categories in the travel authorization are considered Higher Risk
  - i. Other
- d. Higher Risk Travel is reviewed by RSC and guidance is provided to the traveler, and when necessary, the travel approver.

#### Lower Risk Travel

- a. The following destinations are considered Lower Risk
  - i. All international destinations that are not Higher Risk or Comprehensively Sanctioned
- b. The following international activity categories in the Travel Authorization are considered Lower Risk
  - i. Conference
  - ii. Student Recruitment
  - iii. Study Abroad
- c. The following export categories in the Travel Authorization are considered Lower Risk
  - i. Computer/Laptop

- ii. Nothing

**RSC Review of International Travel Authorizations**

S1. The traveler receives an automated email via ecompliance after submitting an international Travel Authorization.

- a. Lower Risk Travel, Higher Risk Travel, and Comprehensively Sanctioned Destination
  - a. The automated email reminds the traveler of disclosure requirements related to the MU conflict of interest program and federal funding agencies and encourages the traveler to reach out to RSC. The automated email provides basic export control and sanctions compliance guidance.
- b. Higher Risk Travel
  - a. The automated email to the traveler indicates that the travel is Higher Risk. The automated email includes notification that RSC will be reviewing travel and providing further guidance as appropriate.
- c. Comprehensively Sanctioned Destination
  - a. The automated email to the traveler indicates that the travel is to a destination that is comprehensively sanctioned by the U.S. Department of the Treasury (Treasury) and/or subject to an embargo by the U.S. Department of Commerce (Commerce). The email includes notification that RSC will be reviewing and approving the travel.

S2(a). RSC receives an automated email via ecompliance when the traveler submits a Travel Authorization for a Comprehensively Sanctioned Destination or Higher Risk Travel.

- a. RSC will review and approve travel to a Comprehensively Sanctioned Destination.
- b. RSC will review and provide guidance for Higher Risk Travel.

S2(b). RSC does not receive an automated email via ecompliance when the traveler submits a Travel Authorization for Lower Risk Travel and does not proactively review Lower Risk Travel, unless the traveler or the traveler's approver requests assistance.

S3. RSC undertakes the following steps to review Comprehensively Sanctioned Destination and Higher Risk Travel

- a. Assess whether the travel requires a General or Specific License from Treasury.
  - a. RSC will discuss the proposed travel with the traveler, and the travel approver, as needed, to ascertain all the facts.
  - b. If no General or Specific License is required from Treasury, move to g.
  - c. If a General License is available authorizing the travel, RSC will document the use of the General License pursuant to RSC recordkeeping procedures and legal and regulatory requirements.
  - d. If a General License is not available, RSC will discuss the institution's potential application for a Specific License with the traveler and the travel approver. Factors that are assessed related to an application for a Specific License include the timeliness of said application and the likelihood of success based on the facts of the travel.
  - e. If no General License is available, or a Specific License is not likely to be granted, or the traveler and/or travel approver do not wish to pursue a Specific License, RSC will deny approval of the travel authorization for a Comprehensively Sanctioned Destination.
  - f. If an application is made for a Specific License, RSC will not approve the travel unless and until the Specific License is approved by Treasury.
    - i. In some instances, the travel date may pass before a decision is made by Treasury regarding the Specific License. In that case RSC will deny the travel and close the transactional review of the travel authorization.
  - g. Once the General or Specific License determination is made, RSC will move to b.
- b. Assess whether the travel requires an export license from Commerce, the U.S. Department of State (State),

## RSC – Training and Awareness

the U.S. Nuclear Regulatory Commission (NRC), the U.S. Department of Energy (DOE) or another cognizant federal agency.

- a. If no license is required, or there is an applicable license exception or other General License, available from Commerce, State, NRC, DOE or other cognizant federal agency, RSC will document the determination pursuant to RSC recordkeeping procedures and legal and regulatory requirements.
  - b. If an export license is required from Commerce, State, NRC, DOE, or other cognizant federal agency, RSC will discuss the potential application for the license with the traveler and the travel approver. Factors that are assessed related to an application for a license include the timeliness of said application and the likelihood of success based on the facts of the export.
    - i. If an export license is not likely to be granted, RSC will deny approval of the export that requires the license.
    - ii. If an application is made for an export license, RSC will not allow the export to take place unless and until the export license is approved by the cognizant federal agency.
    - iii. In some instances, the travel date may arrive before a decision is made by the cognizant federal agency regarding the export license. In that case RSC will deny the export and close the transactional review of the travel authorization.
  - c. Once the export licensing determination is made, RSC will move to c.
- c. Assess potential research security risks.
- a. General research security risks are posed by engagement with higher risk institutions and potentially individuals.
  - b. Higher risk institutions and individuals include those listed on export-related restricted, denied, and blocked persons lists, regardless of export licensing requirements, and sanctions programs-related blocked persons lists, regardless of sanctions restrictions or prohibitions, as well as other international export and sanctions related lists. Additionally, the Lists Published in Response to Section 1286 of the National Defense Authorization Act for Fiscal Year 2019 by the Department of Defense, and the Australian Strategic Policy Institute's China Defence Universities Tracker are consulted. Other open-source information may be reviewed as well related to the institution(s) a traveler may be visiting or conferences or speaking engagements the traveler may be engaging in.
  - c. Financial support from a foreign party for the travel may raise risks requiring disclosure and approval via the MU Conflict of Interest office and/or disclosure to federal funding agencies via Sponsored Programs Administration and the pre and post award disclosure requirements imposed by research sponsors.
  - d. Activities that may be leveraged of military or security purposes may be considered high risk, regardless of the applicability of export licensing requirements to the activity.
- d. Once both the sanctions licensing determination and export licensing determination and related approvals are complete, and any research security concerns are addressed and/or mitigated, RSC will complete its review for Higher Risk travel and either approve or deny Comprehensively Sanctioned Destination travel.
- e. RSC will document the decision pursuant to RSC recordkeeping procedures and legal and regulatory requirements. Once RSC approves the travel authorization for a Comprehensively Sanctioned Destination, the travel authorization moves to the travel approver. For Higher Risk Travel, while not directly involved in approving or denying, RSC will provide guidance and support to the travel approver and in certain high-risk situations, may escalate final approval of Higher Risk Travel to department and college leadership.