

From: [Human Resources Admin](#)
To: [FIU Faculty and Staff](#)
Subject: Consequences for Non-Compliant International Travel on Behalf of FIU
Date: Thursday, February 20, 2025 10:20:21 AM
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MEMORANDUM

To: FIU Faculty and Staff

From: Jennifer LaPorta, Chief Compliance Officer Office of University Compliance & Integrity
Alexandra Mirabal, Associate VP and Controller Office of the Controller
Birgitta Rausch Montoto, Director FIU Global

Date: February 20, 2025

SUBJECT: CONSEQUENCES FOR NON-COMPLIANT INTERNATIONAL TRAVEL ON BEHALF OF FIU

Effective March 1, 2025, if you depart on an international trip prior to full Travel Authorization (TA) approval, a confirmation of which is emailed to you, there will be no reimbursement of travel expenses paid by you from personal funds, and repayment from the traveler to the University for expenses paid with University funds will be required. Further, an employee may be subject to discipline and/or restrictions on international travel privileges. Regardless of whether a proxy assists in the TA process, the *traveler* is responsible for verifying that the TA is fully approved before departing on the trip and will be held accountable if it is not.

Please reference the full memorandum below which also includes details from our previous notifications.

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

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

Pre-departure Approval Process:

As a reminder, all FIU faculty, staff, student-employees, courtesy faculty, persons of interest, and volunteers traveling internationally on FIU-sponsored or FIU-related trips (Travelers), are

required to complete a Travel Authorization (TA) and Expense Post Travel Compliance Report (ER). A TA is expected to be submitted at least *twenty* business days prior to the travel date and must be fully approved before travel commences and any expenses are incurred by the University.

When completing a TA, the traveler must personally complete a pre-departure Foreign Travel Guidance and Screening Questionnaire and acknowledge their understanding of and agreement to abide by FIU's Guidance for International Travel.

TAs for international travel are expected to be submitted at least **twenty (20) business days** before departure **and** before any expenses are incurred by the University to allow sufficient time for screening by the Export Control Office, and full approval. There are significant restrictions related to foreign countries of concern (FCC), which may impact screening time and approval (FCCs include the People's Republic of China, the Russian Federation, the Islamic Republic of Iran, the Democratic People's Republic of Korea, the Republic of Cuba, the Venezuelan regime of Nicholas Maduro, or the Syrian Arab Republic). For this reason, it is recommended that TAs involving these locations be submitted as early as possible. Please note that until the TA is fully approved, **the traveler cannot depart on the trip.**

Effective March 1st, if the traveler departs on the international trip prior to obtaining full TA approval, the traveler will be entirely responsible for all trip expenses incurred. This includes that there will be no reimbursement of expenses paid by the traveler from personal funds and repayment will be required from the traveler to the University for expenses paid with university funds. This also includes grant-funded international trips, as grant funds will not be disbursed without pre-departure TA approval. FIU will follow the requirements of [FIU Regulation 1111](#), Employee Debt Collection for the collection of any expenses for unauthorized trips. Regardless of whether a proxy assists in the TA process, the *traveler* is responsible for verifying that the TA is fully approved before departing on the trip and will be held accountable if it is not. Further, an employee may be subject to discipline and/or restrictions on international travel privileges.

Post Travel Compliance Reporting:

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

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

The Provost or designee reserves the right to restrict international travel until further notice for travelers who do not complete and meet all legal and institutional pre-departure and/or post-travel requirements outlined in the University [International Travel Policy](#) and the [Travel and Other Expenses Manual](#). Non-compliance with these requirements may also result in disciplinary action.

Please note that students not employed by FIU follow a different process which includes

completing a required pre-departure travel registration and orientation prior to going abroad through the Office of Education Abroad.

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