

Travel Warnings: Developing Effective Response Procedures

BY JULIE FRIEND

For many years, international travelers associated U.S. Department of State (DOS) Travel Warnings, the highest level of government alert, with conflict zones, failed states, or countries where the U.S. lacked diplomatic relations. However, increased efforts by the U.S. DOS to inform the traveling public about safety and security risks have resulted in recent Travel Warnings about countries where education abroad programs are common. Furthermore, continued media attention on these Travel Warnings has prompted college students and their parents to ask more questions about risk assessment. Unfortunately, many institutions and organizations offering education abroad programs lack a systematic approach to international travel risk review and assessment, and few guidelines exist to help education abroad professionals develop such procedures. Waiting until the need arises is too late. A thorough review requires significant time and effort. If harm is imminent, this delay could put students, faculty, and staff currently abroad at risk. Therefore, it is necessary to develop review criteria well in advance of the need. The following guidelines can help you develop a process that complements your institution's or organization's tolerance for risk.

Not All Travel Warnings Are Created Equal

Travel Warnings are the highest level of advisory, noting long-term, systemic, dangerous conditions tied to political, social, economic, or environmental conditions. Also, in some locations, the U.S. government's ability to assist travelers in distress may be severely limited due to internal or external travel restrictions.

Although a warning technically applies to an entire country, the dangers and cautions may be specific to certain cities or locations within the country, such as Mexico's border areas or the Mindanao region of the Philippines. A warning may or may not recommend de-

ferring all travel. It may order or merely authorize the departure of dependants or nonessential embassy or consulate personnel. As Michelle Bernier-Toth, director of American citizen services in the Bureau of Consular Affairs at the U.S. DOS, describes the process of crafting a Travel Warning, "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 points out that the U.S. DOS Travel Warning to Lebanon reflects risks to American travelers, yet she feels that Lebanese Americans who travel regularly to the country may be more comfort-

DISCLAIMER: This article 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.



able with the potential risks involved because of their ability to blend into their surroundings. They often stay with families and are integrated into residential communities. This is a lower risk environment than the high-rise hotels and restaurants frequented by Westerners. An education abroad program that attracts travel-savvy Lebanese American students 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 students.

The Evolution of a Travel Warning

When a Travel Warning reflects pervasive, violent, indiscriminate criminal activity, such as is the case in the border areas of Mexico, its evolution may be traced through the increasing number and intensity of embassy-issued Warden Messages. In the Mexico example, this led to a Travel Alert that lasted for an unusually long time, followed by an actual Travel Warning, issued in mid-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 citizen 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.

According to Bernier-Toth, when an embassy or consulate authorizes or orders a departure of dependents or nonessential personnel, this automatically triggers a Travel Warning, as was the case in Mexico in March 2010 and also in Thailand in May 2010. In other cases, a Travel Warning may be issued suddenly. This occurred in Georgia in August 2008, when the conflict between Georgia and South Ossetia put civilians in the crossfire with less than 24 hours notice.

Policies and Preparation

Deciding whether or not to send students to countries with a U.S. DOS Travel Warning is a delicate matter on many campuses and in many organizations. The level of risk that an institution or organization is willing to accept is a management decision—and there is no right answer to this question. Some institutions or organizations have straightforward blanket policies that prohibit travel to all locations under a U.S. DOS Travel Warning. In such cases, decisionmaking is relatively simple. For institutions that lack time, personnel, or expertise to properly analyze each warning in light of proposed program activities, this is an understandable method of managing risk. On the other hand, some institutions/organizations do not have any policies or restrictions tied to Travel Warnings. They may, however, require travelers to sign waivers acknowledging the warning and the institution's inability to assist in an emergency.

Somewhere in the middle are institutions and organizations with more flexible policies that trigger a review process when a warning is issued, and this appears to be a trend in the field. Such a process allows institutions and organizations to support international activities in areas of heightened concern, but also to better manage risk. Most of these institutions and organizations engage in a process similar to the one described below.

A 10-Step Program for Risk Assessment and Response

1 Determine your institution's or organization's level of risk tolerance.

Prepare an inventory of programs in locations perceived to be of higher risk. Factors to consider include frequent or violent civil unrest, high rates of violent crime, unsafe public transportation due to poor road or vehicle conditions and/or a 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. Discuss the academic value of such programs and be able to articulate that the value of the program permits a certain level of risk. Note how your programs complement the international activities or outreach at your institution/organization. At its best, education abroad programming should reflect the institution's international goals and therefore be supported by various constituents who share these goals.

Confer with colleagues in academic 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.)

Develop a plan for responding to a change in the risk environment, such as the issuance of a U.S. DOS Travel Warning (see steps 2–10).

2 Analyze all media reports and other sources of security information through U.S. government officials, subscription services, international insurance providers, etc., for the area(s) in question.

To discuss your security concerns with regard to specific program locations and activities with a representative from the U.S. DOS, contact a Research Information Support Center (RISC) analyst at the Overseas Security Advisory Council (OSAC),* or the Regional Security Officer (RSO) or Assistant Regional Security Officer (ARSO) at the

*If you are not currently a member of OSAC, you can join for free by following the instructions on its Web site.



History of the U.S. Travel Information Program

Before engaging in risk assessment, it's important to understand how risk information is developed. The U.S. DOS began its travel information program for the general public in 1978. At that time, 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, 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, but credible threat to a Pan Am flight out of Frankfurt, Germany. The U.S. DOS, in turn, disseminated a bulletin to several embassies, but not to the general public. On December 21, 1988, Pan Am Flight 103 exploded over Lockerbie, Scotland, killing 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 threats to aviation should be released to the public. In 1990 Congress passed the Aviation Security Improvement Act that in Section 109, 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-civil 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 via various consular information program documents, including Travel Warnings, Travel Alerts, Country Specific Information sites, and Warden Messages. Sources for these consular documents include information from local law enforcement, local media, the intelligence community, and embassy staff as well as a country's own intelligence agency or other similar foreign government agencies, such as the U.K. Foreign and Commonwealth Office or the Australian Office of Foreign Affairs and Trade. In 1992 these consular documents were regrouped into three now-familiar categories: Warden Messages, Public Announcements, and Travel Warnings. In 2007 Public Announcements were renamed “Travel Alerts.”

The sources of consular documents differ slightly by type. Warden Messages are produced by embassies and consulates and approved by the U.S. DOS. Warden Messages are low-level advisories most often relevant to expatriates living in the area, although they can be useful for travelers, too, since they remind residents of public holidays or transportation issues such as train strikes, roadblocks, or planned public demonstrations. Travel Alerts and Travel Warnings, on the other hand, are a collaborative effort between an embassy and the U.S. DOS. Travel Alerts describe temporary threats, including potential risks related to elections, major sporting events, civil unrest related to political or economic issues facing the country, outbreaks of widespread disease such as H1N1, or a break-down of infrastructure following a natural disaster.

local U.S. embassy or consulate. You can also contact the relevant Country Desk Officer at the U.S. DOS. For additional perspectives, review information from other governments' travel Web sites, such as Australia, Canada, or the United Kingdom.

Additionally, many international insurance companies provide daily security updates or even specialized reports on high-profile events. There is usually no extra cost for this information, but advance enrollment is recommended. You may also wish to subscribe to one of the many security information services. Well-known providers include, but are not limited to, I-Jet, Stratfor, Control Risks, ASI Group, Eurasia Group, G4S, and Oxford Analytica. Some level of information is often free, but other products or services vary in price, so take time to research your needs before signing any agreements. In any case, make certain that you have at least one, and preferably more than one, staff member responsible for regularly reviewing security updates and, if necessary, sharing or acting on the information presented.

3 *Collect data on student enrollment and type of program to assess risk.*

Determine the locations and durations of programs in the area of concern, as well as the number of students currently in or planned for each place. It is often helpful to plot this out on a map. 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).

Note 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.).

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 or not such risks can be reasonably mitigated by changing the program's location, postponing the program to a later date, altering an itinerary's route, 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



Find online resources about travel warnings at www.nafsa.org/webextra.



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. For example, an internship with a nongovernmental organization (NGO) located in a township may be ranked high risk, but if the project is of high value to the community and if the employees or volunteers are well-regarded by area residents, community members can help to effectively minimize risks. Also consider the participants' maturity, language proficiency, ties to 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 2008, when the Russian army was advancing on Tbilisi, Georgia, this act, coupled with the closure of the airport, the issuance of a Travel Warning, and the arrangement of U.S. gov-

ernment convoys to Yerevan, Armenia, was cause for concern 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 programs in Kenya.

It is a good idea to develop a shelter-in-place plan in case a mass evacuation is inadvisable. It may be safer for students/faculty/staff to stay put, depending on where they are in a particular city. This was the response that most institutions with students in Thailand implemented in May 2010. Students were strongly advised to stay far from the areas of conflict and, on days when the unrest was at its worst, to not leave their residences for a period of 24–48 hours.

4 Consult with colleagues at peer institutions or organizations.

Instead of making blanket requests for data about risk assessment or decisions regarding Travel Warnings on broad-based listservs or networks of education abroad institutions and organizations, develop a network of institutions or organizations similar to yours with which you can quickly share information. The actions of institutions/organizations similar in student body, size, scope, emergency resources, and level of risk tolerance will be the most relevant to those involved in your decisionmaking process.

5 Communicate with partners abroad.

Engage relevant partners abroad during your planning process (as part of your general emergency preparedness procedures) or during the assessment phase. Discuss perceived risks, the organization's risk "culture," resources to mitigate risks, communication protocols, and emergency response plans.

Accept 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 that there are both objective and subjective views of risk, so reviewing risks and their management when choosing a partner may help to minimize the potential of vicarious liability (if you are offering a joint activity) and the public relations consequences for the perceived less-than-adequate decisions of a partner.

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

6 *Call a meeting of key officials at your institution.*

Based on your institution or organization's suspension policy, decide if your institution or organization will (a) continue operating in spite of a Travel Warning; (b) suspend an existing program and ask students/faculty/staff to return home (refer to the January 13, 2010, NAFSA Education Abroad Knowledge Community Subcommittee SECUSS-L post /statement on Haiti and Crisis Response/Evacuation); or (c) suspend the program before it starts.

This step must involve a variety of stakeholders at your organization/institution because it is critical for everyone to understand your organization's or institution's risk strategy, as everyone has a role in effective risk management. Your stakeholders may include, but are not limited to, the president or provost; governing board or 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 or security, university and public relations, etc.

Topics for discussion should include: the data that you have gathered in steps two through five, the ability to assess risks (in general and during a specific crisis), the status of similar institutions or organizations facing similar decisions, the preparedness for and ability to respond to emergencies (including evacuation), and risk mitigation strategies (i.e., whether or not travelers are required to have international health insurance coverage, whether or not 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 *Communicate with your students, staff, faculty, and parents.*

Contact students, staff, and faculty abroad to inform them of the Travel Warning (hopefully, their travel was registered with the U.S. DOS, so they will have been receiving regular e-mail messages from the embassy already), and report that you have consulted with your local partners and key officials at your institution or organization to assess safety and security. Share your decision-making timeline and provide contact information for someone to

whom travelers and their families can direct questions. You may also wish to prohibit travel to cities or states mentioned in the Travel Warning, and state that the penalty for doing so could be dismissal from the program. Most importantly, solicit student input. Does he or she feel safe or unsafe? Why or why not? What personal measures does he or she take to feel safe and to mitigate risk?

8 *Design a broad communication plan that includes information on how your institution communicates about risk.*

Plan how your institution or organization will communicate about risks with its constituents (students, parents, and spouses). 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 participation. If you elect to "stay the course," provide an option for students with lower tolerance for risk 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 or organization will take to mitigate the spread of rumors.

9 *Prepare talking points for all staff in your unit or office.*

Once your institution or organization 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. Prepare talking points in advance. Pay as much attention to the process of communicating with stakeholders as you do to explaining the content of the information.

10 *Maintain daily monitoring.*

Commit to monitoring programs in locations of concern 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.



Strike a Balance

Of course, this article is only an overview of a process that must be tailored individually to each organization or institution. It appears difficult and time consuming the first time you implement it, and it often is, but it becomes streamlined over time.

No travel experience is risk-free and some education abroad programs, due to their locations or activities, pose more risk than others. Acknowledge that a balance can be struck between total safety and absolute danger when appropriate review and response strategies are in place.

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