

ASSET EXPORT AND TRAVEL RESTRICTION

Direct Care and Treatment

Executive Board

Issue Date: November 4, 2025 Effective Date: December 2, 2025 DCT Policy Number: 100-1010

POLICY:

The State of Minnesota must ensure the security of assets and data while users are traveling outside the United States and that proper authorization is granted to users who wish to access state systems and data while traveling abroad; accordingly, only devices approved by Direct Care and Treatment (DCT) General Counsel and Minnesota IT (MNIT) for international travel will be used, and approval to take these devices and access state systems and data must be obtained prior to travel.

Executive Board members are strictly prohibited from transporting, using, or accessing DCT-owned devices while traveling outside the United States without prior written approval has been granted by DCT General Counsel and MNIT. MNIT has the ultimate authority to approve or deny access based on the risk those locations present.

AUTHORITY:

[Minn. Stat. § 246C.06 \(Executive Board; Membership; Governance\)](#)

[Minn. Stat. Chapter 13 \(State of Minnesota Data Practices Act\)](#)

[45 C.F.R. Part 160](#) (Health Insurance Portability and Accountability Act (HIPAA))

[MNIT International Travel Policy](#)

APPLICABILITY:

DCT Executive Board Members

PURPOSE:

To mitigate unique risks when conducting State business outside of the United States in addition to the ones present when conducting business within the United States. To set consistent requirements for how business is conducted while outside the country to allow the State to better protect its systems and data. To safeguard sensitive, proprietary, and regulated data from exposure to environments with inadequate legal protections or heightened cybersecurity threats.

DEFINITIONS:

Authorized Exception – Written and documented approval granted by both executive leadership and MNIT permitting limited, specific international use of DCT assets.

DCT Assets – Any equipment, device, system, or data owned or managed by DCT, including but not limited to laptops, mobile devices, storage media, and cloud-based systems.

International Travel – Any travel outside of the United States or U.S. territories.

PROCEDURES:

A. Roles and Responsibilities

1. Executive Board Members:

- a) be aware of and follow this policy and related standards and procedures.
- b) contact the Data Privacy Office at email privacy.office.dct@state.mn.us with questions

about this policy and related standards and procedures.

2. MNIT:

- a) develop, maintain, and assess compliance with this policy.
- b) provide training on this policy.
- c) assist agencies and personnel with understanding and implementing this policy and related standards and procedures.

B. Pre-Travel Requirements

- 1. All Executive Board members must notify DCT General Counsel via email at privacy.office.dct@state.mn.us thirty days in advance of any planned international travel that involves the transport of DCT assets.
- 2. DCT General Counsel Data Privacy Office will assist in obtaining approvals the use of assets outside the United States and Unites State territories.

C. Enforcement

Violations of this policy may result in disciplinary action, up to and including termination, and potential legal consequences.

D. Approvals

Approvals must be documented in writing by DCT General Counsel and MNIT.

E. Communication and Training

This policy will be communicated during onboarding and included in regular information security training.

REVIEW:

Biennially

REFERENCES:

None

ATTACHMENTS:

(DCT) International Travel System Access Request 100-1010a

SUPERSESION:

All DCT Executive Board policies, memos, or other communications whether verbal, written, or transmitted by electronic means regarding this topic.

/s/

DCT Executive Board
Executive Board Chair
Direct Care and Treatment