

15.05.04.R1 High Risk Global Engagements and High Risk International Collaborations

Approved: May 5, 2025
Revised March 4, 2026
Next Scheduled Review: March 4, 2026



Rule Summary

East Texas A&M University (University) encourages its employees to establish global engagements in the pursuit of mutually beneficial fundamental scientific inquiry, cultural, or educational opportunities. These activities strengthen the academic and research programs and are fundamental to the university's educational system. This rule is required by System Regulation 15.05.04, *High Risk Global Engagements and High Risk International Collaborations*.

Procedures and Responsibilities

1 GENERAL

All employees will comply with this rule and System Regulation 15.05.04, *High Risk Global Engagements and High Risk International Collaborations*. Failure to comply may result in disciplinary action up to and including dismissal. Definitions are consistent with System Regulation 15.05.04.

2 AUTHORITY AND RESPONSIBILITY

Pursuant to the University Rule 15.02.99.R1, the Vice President for Research & Economic Development serves as the University's Empowered Official (EO) and is the designated official for high-risk global engagement and high-risk international collaboration activities.

3 HIGH RISK GLOBAL ENGAGEMENT AND HIGH RISK INTERNATIONAL COLLABORATION ADMINISTRATION

3.1 All High Risk Global Engagements and High Risk International Collaborations will be reviewed by the EO. As part of an export control review, the EO may engage the Purchasing and Contract Administration Office, Ethics and Compliance Office, or other university offices to review the proposed activity for conflicts of commitment, conflicts of interest, and undue foreign influence.

3.2 The EO has the authority to deny any high-risk global engagement or high-risk international collaboration activity prior to submitting it to the System Research Security Office (RSO) for review and approval pursuant to System Regulation 15.05.04. If the EO does not approve the activity, the EO will send the System RSO a courtesy copy.

- 3.2.1 If the EO decision to deny a high-risk global engagement or high-risk international collaboration activity is appealed, the proposed activity will be submitted to the System RSO for review and approval pursuant to System Regulation 15.05.04.
- 3.3 A high-risk global engagement or high-risk international collaboration activity approved by the EO will be submitted to the System RSO for review and approval pursuant to System Regulation 15.05.04.
 - 3.3.1 High-risk global engagement activities will be submitted to the System RSO prior to final execution and no later than 10 business days in advance.
 - 3.3.2 High-risk international collaboration activities will be submitted to the System RSO no later than 10 business days in advance of the proposed start date.
- 3.4 Once the Vice Chancellor for Research's final approval or denial is provided by the System RSO, the EO will notify the involved parties of the decision. Any defined mitigating measures for approvals will be communicated to the involved parties and monitored by the Division of Research and Economic Development staff or designated university office.
 - 3.4.1 Approvals for activities are valid for the duration of the contract or collaboration. If any amendments are made to the contract or collaboration, a new review is required.
- 3.5 All high-risk global engagement or high-risk international collaboration activities will be maintained in designated document management systems.

4 TRAINING

Employees involved in high-risk global engagement or high-risk international collaboration activities are required to complete the "*Export Controls & Embargo Training*" (course #2111212) via TrainTraq once every two years. Additional research security training modules are available in TrainTraq and assigned to employees as required.

5 GENERAL PROHIBITIONS

- 5.1 Employees are prohibited from participating in any Malign Foreign Talent Recruitment Programs. Any employee who received a solicitation to participate in a Malign Foreign Talent Recruitment Program will notify the EO, who in turn will inform the System RSO pursuant to System Regulation 15.05.04.
- 5.2 The University will not maintain contracts or agreements with a Confucius Institute.
- 5.3 Employees are prohibited from accepting gifts, including travel expenses, from a Country of Concern. Any employee approached by groups representing a Country of Concern with a gift offer will notify the EO and submit a gift reporting form. The EO will inform the System RSO in accordance with system regulations. If the University wished to accept a gift, whether directly or indirectly from a citizen of a foreign adversary, the request must be reviewed pursuant to System Regulation 15.05.04.

- 5.4 All professional travel to a Country of Concern will be reviewed pursuant to System Regulation 15.05.04. All personal travel to a Country of Concern will be reported in Workday.
- 5.5 Employees are prohibited from entering into High Risk Global Engagements and participating in High Risk International Collaborations with entities on the most recent list developed pursuant to Section 1286 of the National Defense Authorization Act for Fiscal Year 2019 (Public Law 115-232) as amended.
- 5.6 The EO will notify the System RSO of any federal funding agency's request for a research security risk review. The EO will coordinate with the System RSO and the Office of General Counsel for any response to the funding agency.

Related Statutes, Policies, or Requirements

[Section 117 of the Higher Education Act of 1965, 20 U.S.C. 1011f](#)

[International Traffic in Arms Regulations \(ITAR\) 22 CFR 120-130](#)

[Export Administration Regulations \(EAR\) 15 CFR 730-774](#)

[Chips and Science Act of 2022 \(Public Law 117-167\)](#)

[Determination of Foreign Adversaries 15 CFR 791.4](#)

[John S. McCain National Defense Authorization Act for Fiscal Year 2019 \(Public Law 115-232\)](#)

[Executive Order GA-48 \(November 19, 2024\)](#)

[System Policy 15.02, *Export Controls Program Management*](#)

[System 15.05, *System Research Security Office*](#)

[System Regulation 15.05.04, *High Risk Global Engagements and High Risk International Collaborations*](#)

[System Policy 25.07, *Contract Administration*](#)

[System Regulation 25.07.01, *Contract Administration, Delegations, and Reporting*](#)

[System Regulation 31.05.01, *Faculty Consulting and/or External Professional Employment*](#)

[University Rule 15.02.99.R1 *Export Controls Program Management*](#)

[University Rule 25.07.99.R1 *Contract Administration*](#)

[University Rule 31.05.01.R1 *Faculty Consulting and/or External Professional Employment*](#)

Contact Office

Research and Economic Development

903.886.5964

Research.Compliance@tamuc.edu