

**High Risk Global Engagements and International Collaborations**

Approved: April 6, 2023

Revised: April 23, 2025

Next Scheduled Review: April 23, 2030

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**Rule Summary**

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Texas A&M University-Texarkana (A&M-Texarkana) 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. This rule intends to outline the steps necessary to ensure appropriate administration of these engagements and collaborations that are determined to be high risk, as defined in The Texas A&M University [System \(System\) Regulation 15.05.04, High Risk Global Engagements and High Risk International Collaborations](#).

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**Rule**

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**1. AUTHORIZATION**

The provost, acting as the Empowered Official (EO) and Research Compliance Officer (RCO), has the authority to review and submit High Risk Global Engagements or High Risk International Collaborations to System for final approval.

**2. GENERAL PROHIBITIONS**

- 2.1 Malign Foreign Talent Recruitment Programs – All System employees are prohibited from participating in Malign Foreign Talent Recruitment Programs and must report any solicitations to participate in such to the EO. A&M-Texarkana will also report such solicitations to the System Research Security Office (RSO).
- 2.2 Confucius Institutes – The university is prohibited from maintaining contracts or agreements with a Confucius Institute.
- 2.3 All employees are prohibited from accepting gifts from or traveling to a Country of Concern for professional purposes. Any employee approached by groups representing a Country of Concern that offers gifts or travel must immediately report the activity to the EO, who must report it to the System RSO. Additionally, all employees must report personal travel to Countries of Concern in Workday.
- 2.4 All 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.

### **3. REVIEW OF HIGH RISK GLOBAL ENGAGEMENTS AND HIGH RISK INTERNATIONAL COLLABORATIONS**

3.1 All international engagements and international collaborations must be reviewed by the Export Control Office prior to execution.

3.1.1 The Export Control Office will review the international engagement or international collaboration for any potential conflicts of commitment, conflicts of interest, export control, or undue foreign influence concerns related to the proposed engagement or collaboration. These concerns must be addressed or resolved prior to any request for approval through the System Regulation 15.05.04 process.

3.1.2 The Export Control Office will ensure that export control training is current for all employees involved in the proposed engagement or collaboration prior to any request for approval through the System Regulation 15.05.04 process.

3.1.3 Restricted Party Screening must be completed for all Foreign Persons involved in the proposed international engagement or international collaboration and returned to the satisfaction of the EO.

3.1.4 The Export Control Office will then provide approval unless the international engagement or international collaboration involves a Country of Concern. If the activity (High Risk Global Engagement or High Risk International Collaboration) involves a Country of Concern, the Export Control Office must submit the request to System RSO for review and approval as outlined in section 2.2.

3.2 Any High Risk Global Engagement or High Risk International Collaboration must be submitted to the System RSO for risk review, the System Office of General Counsel (OGC) for legal compliance review and ultimately the vice chancellor for research for final approval prior to execution.

3.2.1 A&M-Texarkana Research Compliance Offices is responsible for all records retention.

### **4. TRAINING**

All employees at A&M-Texarkana must be trained in Export Controls via TrainTraq. This training will be assigned automatically upon hire and be repeated on a two-year cycle.

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### **Related Statutes, Policies, or Requirements**

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[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 \(Public Law 117-167\)](#)

[Servicemember Quality of Life Improvement and National Defense Authorization Act for Fiscal Year 2025 \(Public Law 118-159\)](#)

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

[Executive Order GA 48 by the Governor of the State of Texas](#)

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

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

[System Policy 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 15.01.03.H1, Financial Conflicts of Interest in Sponsored Research](#)

[University Rule 15.02.99.H1, Export Controls](#)

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## **Definitions**

[Click to view Definitions](#)

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## **Contact Office**

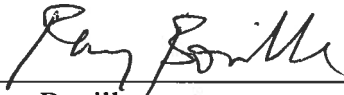
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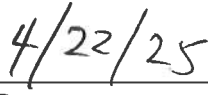
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**System Approvals\***

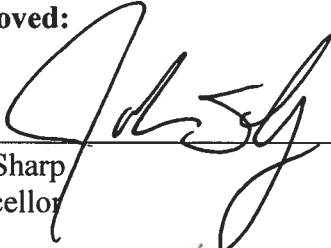
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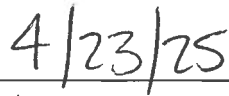
**Approved for Legal Sufficiency:**

  
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Ray Bonilla  
General Counsel

  
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Date

**Approved:**

  
\_\_\_\_\_  
John Sharp  
Chancellor

  
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Date

**\*System approvals are contingent upon incorporation of any and all System-required changes in the rule's final posting.**