

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



Approved: May 5, 2025  
Next Scheduled Review: May 5, 2030

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### Rule Summary

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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*.

This rule has been amended to comply with Governor Greg Abbott's Executive Order GA-48 dated November 19, 2024.

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### Procedures and Responsibilities

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#### 1 GENERAL

All employees must comply with this rule and System Regulation 15.05.04, *High Risk Global Engagements and High Risk International Collaborations* when involved in any High Risk Global Engagement or High Risk International Collaboration. 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 Engagements and High Risk International Collaborations.

#### 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 before the proposed activity is submitted to the System Research Security Office (RSO) for the review and approval process defined in System Regulation 15.05.04. In addition to 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.

- 3.1.1 High Risk Global Engagements must be submitted to the System RSO prior to final execution and no later than 10 business days in advance.
  - 3.1.2 High Risk International Collaborations must be submitted to the System RSO no later than 10 business days in advance of the proposed start date.
- 3.2 The University EO has the authority to deny any High Risk Global Engagement or High Risk International Collaboration prior to submitting it to the System RSO for review and approval pursuant to System Regulation 15.05.04. If the EO denies any subjected activity, the EO will provide the RSO with a courtesy copy.
  - 3.2.1 If the EO decision to deny a high-risk global engagement or high-risk international collaboration is appealed, the subjected 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 approved by the EO is submitted to the System RSO for review and approval pursuant to System Regulation 15.05.04.
- 3.4 Once a final approval or denial is provided by the System RSO, the University's 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.
- 3.5 All High Risk Global Engagements and High Risk International Collaborations will be maintained in designated document management systems.

#### 4 TRAINING

Employees involved in High Risk Global Engagements and High Risk International Collaborations are required to complete the "*Export Controls & Embargo Training*" (course #2111212) via TrainTraq once every two years. Additional training, such as NSF Research Security Training modules, are available 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 must notify the University 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 or traveling to a Country of Concern for professional purposes. Any employee approached by groups representing a Country of Concern must notify the EO, who will inform the System RSO according to system regulations. All employees must report personal travel to Countries of Concern in Workday.

- 5.4 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 Nation Defense Authorization Act for Fiscal Year 2019 (Public Law 115-232) as amended.

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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 120-130Export 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\*](#)

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