

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



Approved August 18, 2022  
Next Scheduled Review: August 18, 2027

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### Regulation Summary

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The Texas A&M University System (system) 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 each member's educational system.

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### Definitions

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### Regulation

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#### 1. PURPOSE AND BACKGROUND

The system is committed to protecting the integrity of member research and educational programs, including the interests of all involved in contractual relationships and international collaborations – *research sponsors, the system, system employees, and international collaborators*. Research relationships that promote equitable collaborations invigorate fundamental scientific inquiry, cultural, and educational opportunities and are fundamental to our processes.

#### 2. HIGH RISK GLOBAL ENGAGEMENT AND HIGH RISK INTERNATIONAL COLLABORATION ADMINISTRATION

It is the responsibility of each member to develop and implement a rule supplementing this regulation. The rule must address the following:

- (a) the designation of individuals authorized to review and approve High Risk Global Engagements or High Risk International Collaborations;
- (b) the process for reviewing and addressing any potential conflicts of commitment, conflicts of interest, export control, or undue foreign influence concerns arising from relationships with High Risk Global Engagements and High Risk International Collaborations;
- (c) the process for providing High Risk Global Engagements and High Risk International Collaborations for review and approval as detailed in Section 3;

- (d) the process for complying with training requirements set forth in this regulation; and
- (e) any additional member requirements.

### 3. RISK REVIEW AND APPROVAL

High Risk Global Engagements and High Risk International Collaborations must be reviewed in strict accordance with the following process before being executed.

- (a) On a quarterly basis, the System Research Security Office (RSO) provides member-empowered officials (EOs) with the list of Countries of Concern.
- (b) Prior to executing High Risk Global Engagements or establishing High Risk International Collaborations, members must submit the arrangement to the system RSO for review.
- (c) The system RSO provides a risk review of the proposed High Risk Global Engagement or High Risk International Collaboration to the System Office of General Counsel (OGC).
- (d) System OGC reviews the High Risk Global Engagement or High Risk International Collaboration for legal compliance review. The combined risk and legal compliance review is forwarded to the vice chancellor for research for consideration.
- (e) The vice chancellor for research reviews and determines whether to provide approval for the High Risk Global Engagement or High Risk International Collaboration with notification to the member.
  - (1) Approvals for High Risk Global Engagements or High Risk International Collaborations are valid for the duration of the contract or collaboration. If any amendments are made to the contract or collaboration, a new review process is required.
  - (2) Employees involved in High Risk Global Engagements or High Risk International Collaborations are required to complete export control training once every two years.
  - (3) High Risk Global Engagement records must be maintained in a document management system approved by the system RSO.
- (f) The system RSO provides a High Risk Global Engagement or High Risk International Collaboration briefing to the Board of Regents annually. This briefing summarizes the risks to the system associated with international activities.

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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](#)

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

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

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](#)

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## **Member Rule Requirements**

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A rule is required to supplement this regulation. See Section 2.

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## **Contact Office**

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