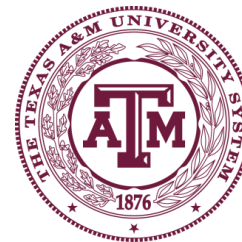


## 15.05.04 High Risk Global Engagements and High Risk International Collaborations



Revised [February 28, 2025](#)

Next Scheduled Review: February 28, 2030

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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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Click to view [Definitions](#).

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### Regulation

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#### 1. GENERAL

(a) Purpose—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.

#### (b) General Prohibitions

(1) Malign Foreign Talent Recruitment Programs—System employees are prohibited from participating in Malign Foreign Talent Recruitment Programs. Any System employee who receives solicitations to participate in Malign Foreign Talent Recruitment Programs must notify their respective office responsible for managing the member's High-Risk Global Engagement and High-Risk International Collaboration process. Members must provide the System RSO courtesy copies of all Malign Foreign Talent Recruitment Program solicitations.

(2) Confucius Institutes—System members are prohibited from maintaining contracts or agreements with a Confucius Institute.

(3) System employees are prohibited from accepting gifts or traveling to a Country of Concern for professional purposes. Members must report to the System RSO any activities where employees are approached by groups representing a Country of Concern that offer gifts or travel. Additionally, all employees must report personal travel to Countries of Concern in Workday.

(4) System 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.

(c) Federal Funding Agency Research Security Inquiries—System members must notify the System RSO of any federal funding agency’s request for research security related risk reviews. Responses to the inquiring federal funding agency will be coordinated with the System member, System RSO, and the Office of General Counsel (OGC).

## 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;

(e) the process for monitoring and disciplinary action for non-compliance with this regulation;

(f) statements prohibiting participation or contracting with Malign Foreign Talent Recruitment Programs and Confucius Institutes; and

(g) any additional member requirements, such as a defined appeal process.

## 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, the member EO must review the proposed activity. If the EO does not

approve the activity, the member must send the system RSO a courtesy copy of the review. High Risk Global Engagements or High Risk International Collaborations approved by the member EO or designee must be submitted to the system RSO for review.

- (1) High Risk Global Engagements must be submitted to the RSO prior to final execution and no later than 10 business days in advance.
  - (2) High Risk International Collaborations must be submitted to the RSO no later than 10 business days in advance of the proposed start date.
  - (3) High Risk Global Engagement and High Risk International Collaboration requests must include all relevant review information, including but not limited to member reviews detailed in Section 2.b.
- (c) The system RSO provides a risk review of the proposed High Risk Global Engagement or High Risk International Collaboration to the System 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](#)

[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 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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Research  
(979) 458-5598

Research Security  
(979) 862-1965

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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:

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John Sharp  
Chancellor

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Date