



15.05.04.L1

High Risk Global Engagements and High Risk International Collaborations

First Approved: July 27, 2023
Revised: March 19, 2026
Next Scheduled Review: March 19, 2031

Rule Statement and Reason for Rule

Texas A&M International University (TAMIU) encourages its employees to establish global engagements in pursuit of mutually beneficial opportunities, while also acknowledging the high risk associated with certain global engagements and international collaborations. This rule is required by The Texas A&M University System ([System Regulation 15.05.04, High Risk Global Engagements and High Risk International Collaborations](#)).

Procedures and Responsibilities

1. GENERAL

- 1.1 TAMIU will fully comply with all applicable federal laws and regulations, along with System Regulations, concerning high risk global engagements and high risk international collaborations.
- 1.2 TAMIU business activities or transactions will not be initiated or conducted with any Foreign Persons located in Countries of Concern unless otherwise approved through the approval process detailed in System Regulation 15.05.04, and in TAMIU SAP 07.01.99.L0.01, Ethics - Complying with Executive Order GA-48.
- 1.3 General Prohibitions
 - (a) Malign Foreign Talent Recruitment Programs—TAMIU employees are prohibited from participating in Malign Foreign Talent Recruitment Programs. Any employee who receives solicitations to participate in Malign Foreign Talent Recruitment Programs must notify the Export Control Office. Courtesy copies of all Malign Foreign Talent Recruitment Program solicitations will be provided to System Research Security Office (RSO).

- (b) Confucius Institutes—System members are prohibited from maintaining contracts or agreements with a Confucius Institute.
- (c) TAMIU employees are prohibited from accepting gifts from a Country of Concern as stated in TAMIU SAP 07.01.99.L0.01, Ethics - Complying with Executive Order GA-48. TAMIU will report to the System RSO any activities where employees are approached by groups representing a Country of Concern that offer gifts.
- (d) TAMIU 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.

- 1.4 Travel to Countries of Concern—All professional travel to a Country of Concern must be reviewed through the process detailed in Section 3 of System Regulation 15.05.04. All personal travel to a Country of Concern must be reported on Workday.
- 1.5 If TAMIU wishes to accept a gift, whether directly or indirectly, from a citizen of a foreign adversary, the proposed transaction must be reviewed through the process detailed in Section 3 of System Regulation 15.05.04.
- 1.6 Federal Funding Agency Research Security Inquiries—TAMIU will 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 System RSO and the Office of General Counsel (OGC).

2. **EMPOWERED OFFICIAL**

The Associate Vice President for Research and Sponsored Projects is the TAMIU Empowered Official (EO) and serves as the TAMIU designated official for high risk global engagements and high risk international collaborations.

3. **INDIVIDUAL RESPONSIBILITIES**

All TAMIU employees should be aware of the potential of high risk global engagements and high risk international collaborations involved in their work and must ensure that their activities and transactions comply with federal, state, System, and TAMIU laws and regulations. It is the responsibility of TAMIU faculty and staff to disclose these activities to the EO.

4. **RISK REVIEW AND APPROVAL**

- 4.1 The review of high risk global engagements and high risk international collaborations will include the EO and the Director of Compliance.

- 4.1.1 Prior to executing High Risk Global Engagements or establishing High Risk International Collaborations, the TAMIU's Empowered Official (EO) must review the proposed activity. If the TAMIU EO does not approve the activity, TAMIU will send the System RSO a courtesy copy of the review. High Risk Global Engagements or High Risk International Collaborations approved by the TAMIU 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 of the proposed start date.

(2) High Risk International Collaborations must be submitted to the RSO no later than 10 business days in advance of the proposed start date.

4.1.2 The EO will review the high risk engagement or high risk collaboration. The review will include a restricted party screening and ensuring the engagement or collaboration is compliant with Bureau of Industry and Security (BIS), Directorate of Defense Trade Controls (DDTC), Office of Foreign Asset Control (OFAC), System, and any other relevant regulations.

4.1.3 The System RSO will provide the VCR's final approval determination to TAMIU regarding the high-risk global engagement or high-risk international collaboration.

4.2 All TAMIU employees are required to take the basic course on export controls and embargo training (course number 211212) available through TrainTraq. Employees involved in high risk global engagements or high risk international collaborations, may be required to take supplemental export controls training as deemed appropriate by the TAMIU EO.

5. **MONITORING**

University Compliance will monitor export control processes and procedures for high risk global engagements and high risk collaborations, ensuring proper identification and approval. They will annually assess risks associated with the university's export control portfolio and recommend improvements. An annual survey will be conducted to assess compliance with state and federal laws, system policies, and university rules. Individual exceptions to compliance will be investigated in accordance with section 4 of the rule. This ensures that high risk activities are properly identified and managed.

6. **COMPLIANCE REVIEWS AND INVESTIGATIONS**

6.1 The System RSO may assist TAMIU in research security compliance reviews and investigations.

6.2 Non-compliance may result in disciplinary action. If deemed noncompliant, the EO may suspend or terminate the activity and notify the System RSO and OGC. Such failure may lead to disciplinary measures, including dismissal, in accordance with system policies and university rules and procedures. The University President makes the final decision on disciplinary actions.

7. **RECORD KEEPING**

7.1 All export control decisions and screening results will be documented, and copies retained by the TAMIU EO or designee.

7.2 Records will be maintained and retained for the longer of the record retention period required by the applicable regulation or the period required for the retention of these records as set forth in the System Record Retention Schedule and [TAMIU SAP 61.99.01.L0.01, Retention of State Records](#).

7.3 TAMIU units will be responsible for maintaining all documentation related to high-risk global engagements and high-risk international collaborations, in accordance with requirements set forth in System Regulation 15.05.04, section 3(e)(3).

Related Statutes, Policies, Regulations, or Rules

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

[TAMIU Rule 15.02.99.L1, Export Controls](#)

[TAMIU SAP 61.99.01.L0.01, Retention of State Records](#)

[TAMIU SAP 07.01.99.L0.01 Ethics - Complying with Executive Order GA-48](#)

[TAMIU Export Control Compliance Program Manual](#)

Definitions

Definitions are consistent with those contained in System Regulation 15.05.04.

Contact Office

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