15.05.04.C1 High Risk Global Engagements and International Collaborations

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Next Scheduled Review: December 12, 2030
Revision History

Rule Summary

This rule establishes Texas A&M University-Corpus Christi (TAMU-CC) processes to accompany Texas A&M University System (System) Regulation *15.05.04, High Risk Global Engagements and High Risk International Collaborations*.

TAMU-CC maintains this rule to support academic excellence and strengthen academic opportunities from international relationships for education, research, cultural opportunities, and other university business. Such international endeavors have safeguard measures under export control laws and regulations. This rule establishes further protection for TAMU-CC employees and students regarding work, intellectual property, proprietary information, integrity, and reputation by managing and mitigating high risks or conflicts related to international academic affairs, collaboration, contracts, hiring, procurement, research, shipping, travel, and visits.

Definitions

See System Regulation *15.05.04, High Risk Global Engagements and High Risk International Collaborations* for applicable definitions.

Rule

1. GENERAL

1.1. Applicability

All TAMU-CC employees must comply with this rule when engaging in any High Risk Global Engagement or High Risk International Collaboration as defined in System Regulation *15.05.04, High Risk Global Engagements and High Risk International Collaborations*.

1.2. General Prohibitions

1.2.1. Participation in High Risk Global Engagements and High Risk International Collaborations as defined in System Regulation *15.05.04, High Risk Global Engagements and High Risk International Collaborations* is prohibited without pre-approval from the System, with or without mitigation measures. Requests for System approval must be routed through the TAMU-CC Export Control Office.

1.2.2. All employees are prohibited from entering into High Risk Global Engagements and/or 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.

1.2.3. TAMU-CC employees are prohibited from participating in Malign Foreign Talent Recruitment Programs as defined in System Regulation *15.05.04, High Risk Global Engagements and High Risk International Collaborations*. Any employee who receives a solicitation to participate in a Malign Foreign Talent Recruitment Program must notify the TAMU-CC Export Control office, which will also provide a copy of the solicitation to the System Research Security Office (RSO).

1.2.4. TAMU-CC is prohibited from maintaining contracts or agreements with a Confucius Institute as defined in System Regulation *15.05.04, High Risk Global Engagements and High Risk International Collaborations*.

1.2.5. All employees are prohibited from accepting gifts from a Country of Concern, as defined in System Regulation *15.05.04, High Risk Global Engagements and High Risk International Collaborations*. TAMU-CC must report to RSO any activities where employees are approached by groups representing a Country of Concern that offers gifts or travel.

1.3. Federal Funding Agency Research Security Inquiries

TAMU-CC employees, including student workers, are prohibited from responding directly to any federal funding agency's request for research security related risk reviews without prior review by the Export Control Office and System approval.

1.4. Travel to Countries of Concern

All professional travel to a Country of Concern must be reviewed in accordance with System Regulation *15.05.04, High Risk Global Engagements and High Risk International Collaborations*. All employees must report

personal travel to Countries of Concern in Workday.

1.5. Gifts to TAMU-CC

If TAMU-CC wishes to accept a gift, whether directly or indirectly from a citizen of a foreign adversary, TAMU-CC will request approval in accordance with System Regulation *15.05.04, High Risk Global Engagements and High Risk International Collaborations*.

2. RESPONSIBILITY AND AUTHORITY

2.1. TAMU-CC's Export Control Empowered Official (EO) is the designated authority responsible for ensuring compliance with this rule regarding research-related matters.

2.2. TAMU-CC's Chief Ethics & Compliance Officer (CECO) is the designated authority responsible for ensuring compliance with this rule regarding non-research matters.

2.3. Both the EO and CECO designate TAMU-CC's Financial Conflict of Interest and Export Control Officer (FCOI/ECO) as the primary contact to review all associated High Risk Global Engagements, High Risk International Collaborations, and related matters.

3. REVIEWS FOR HIGH RISK GLOBAL ENGAGEMENT AND/OR HIGH RISK INTERNATIONAL COLLABORATION

3.1. High Risk Global Engagements and/or High Risk International Collaborations must be reviewed in accordance with this rule before execution or binding the university to any agreement, and before any engagement or collaboration begins.

3.2. High Risk Global Engagements and/or High Risk International Collaborations require review and consideration of potential management and mitigation options prior to approval.

3.3. On a quarterly basis, TAMU-CC receives the list of Countries of Concern from RSO.

3.4. The FCOI/ECO will conduct an initial review of the proposed activity and determine if it should be considered a High Risk Global Engagement or High Risk International Collaboration and thus be reviewed in accordance with this rule. Unfunded passive relationships with Foreign Persons in a Country of Concern such as co-editing for a public journal or co-presenting at a public conference is subject to this review process and may be approved as normal scholarly work upon the required review. For further guidance about whether

a situation or partnership requires review, please contact TAMU-CC's FCOI/ECO.

3.5. Prior to any execution of High Risk Global Engagements or establishment of High Risk International Collaborations, the requesting TAMU-CC employee/department must submit the activity to the FCOI/ECO for review and routing for approval. The High Risk Global Engagement/High Risk International Collaboration document(s) must be submitted with all relevant information for review at least 20 business days in advance of when a decision is needed.

3.5.1. Details of the proposed engagement or collaboration activity with Foreign Persons located in a Country of Concern must be submitted in advance to the FCOI/ECO. The submission is to specify all involved parties, locations, purpose, scope, duration, applicable travel, any applicable transporting or shipping of items, and any potential conflicts of commitment, conflicts of interest, export control issues, or undue foreign influence concerns arising from relationships with High Risk Global Engagements and High Risk International Collaborations. The requestor is also to identify anything that is proprietary, sensitive, confidential, export controlled, or otherwise protected for possible mitigation measures. Additional information may be requested during the review of the submission.

3.5.2. The FCOI/ECO is responsible for the review of the submission, including screenings of involved Foreign Persons and countries for possible government-issued restricted party lists and export control restrictions. A university-approved system will be utilized for the screenings.

3.5.3. The FCOI/ECO's review will provide applicable guidance, recommendations, and any potential mitigation measures for identified risks associated with the requested engagement/collaboration activity.

3.5.4. If the requestor's High Risk Global Engagement or High Risk International Collaboration requires a specific license for export control purposes, the employee/department will provide sufficient details for their license application to the FCOI/ECO for review. The FCOI/ECO will work with RSO to submit the license application to the applicable federal agencies. The federal agencies' response(s) and license document(s) should be filed with the TAMU-CC FCOI/ECO.

3.6. The FCOI/ECO's review of the proposed High Risk Global Engagement or High Risk International Collaboration must be submitted to the EO before

the proposed activity may be submitted to RSO for review pursuant to the System Regulation *15.05.04, High Risk Global Engagements and High Risk International Collaborations* review process.

3.6.1. If the EO approves the proposed activity, it will be routed back to the FCOI/ECO for required submission to RSO.

3.6.2. If the EO does not approve the proposal, the FCOI/ECO must send a courtesy copy of the review to RSO.

3.7. The FCOI/ECO will submit sufficient review information on the proposed High Risk Global Engagement or High Risk International Collaboration to RSO for applicable reviews.

3.7.1. High Risk Global Engagements must be submitted to RSO prior to final execution and no later than 10 business days in advance of when the requestor needs a decision.

3.7.2. High Risk International Collaborations must be submitted to RSO no later than 10 business days in advance of the proposed activity start date, or earlier date if the requestor needs a decision before the start date.

3.8. Once the review is completed, RSO will inform the TAMU-CC of the final decision.

3.9. Approvals for High Risk Global Engagements or High Risk International Collaborations are valid for the duration of the contract or collaboration. Any amendments require a new review process prior to execution.

3.10. Any changes to points of contact, other parties involved, and/or payment information must be reported to the FCOI/ECO upon occurrence.

3.11. High Risk Global Engagement records will be maintained in the appropriate document management system approved by RSO, such as Maestro, depending on the activity.

4. RISK MANAGEMENT OF HIGH RISK GLOBAL ENGAGEMENT AND/OR HIGH RISK INTERNATIONAL COLLABORATION REVIEWS

4.1. The FCOI/ECO will review and address any potential concerns arising from relationships with High Risk Global Engagements and/or High Risk International Collaborations, including but not limited to conflicts of commitment, conflicts of interest, export control, and/or undue foreign influence.

4.1.1. High Risk Global Engagements and/or High Risk International Collaborations require prior review by the FCOI/ECO before approval and/or implementation.

4.1.2. Written documentation is required for any identified risks that require management and mitigation regarding conflicts of commitment, conflicts of interest, export control, or undue foreign influence as identified by the FCOI/ECO.

4.1.3. The FCOI/ECO may discreetly engage applicable campus and/or System stakeholders in due diligence in addressing the matter.

4.1.4. If the potential concern is validated upon review, the FCOI/ECO will ensure that the involved TAMU-CC employees have the opportunity to address and mitigate the concern that arose from the High Risk Global Engagement or High Risk International Collaboration.

4.2. The involved TAMU-CC employee must formalize their mitigation or risk reduction through a management plan and/or a technology control plan approved by the FCIO/ECO before the plan is routed for approval as outlined below.

4.2.1. The EO must approve the proposed plan before submission to RSO for review by the vice chancellor for research.

4.2.2. The approved plan must be submitted to RSO by the FCOI/ECO. If the EO does not approve the proposed plan, the FCOI/ECO will send a courtesy copy of the review outcome to RSO.

4.2.3. If approved by RSO, the EO (research-related concerns) or CECO (non-research related concerns) reviews for final approval and execution of the plan.

4.2.4. The executed plan is filed with the FCOI/ECO for recordkeeping and monitoring.

4.2.5. The plan is effective as long as the concern exists.

4.2.6. If the employee/student would like to update or amend the plan, they must contact the FCOI/ECO for further review and assistance.

5. MONITORING FOR COMPLIANCE AND DISCIPLINARY ACTION

5.1. TAMU-CC employees must comply with the final outcome of a High Risk Global Engagement and/or High Risk International Collaboration review.

5.2. The EO designates the FCOI/ECO to monitor the implementation of the High Risk Global Engagement and/or High Risk International Collaboration activity review.

5.3. Employees seeking a repeat participation in an approved High Risk Global Engagement and/or High Risk International Collaboration activity must submit a new request for routing through the TAMU-CC and System approval process outlined in this rule, even if the proposed activity has the same details as the prior approved activity.

5.4. Non-compliance and breaches may result in implications to the individual and/or university. University level non-compliance is subject to, but not limited to, remediation measures, loss/freeze of research/grant funding, and/or disciplinary action up to and including termination.

6. TRAINING AND RESOURCES

6.1. The university provides export control training and conflict of interest training for employees, including student workers.

6.1.1. These trainings are required for newly hired/rehired employees within 30 days of their hire/rehire date.

6.1.2. These trainings are required at least bi-annually and are assigned to employees whose job functions involve international activities including, but not limited to, High Risk Global Engagements, High Risk International Collaborations, research, contract administration, travel, hiring, procurement/shipping, and/or other international academic or research activities.

6.2. TAMU-CC employees and student workers access this rule and other export control and conflict of interest information via the TAMU-CC website. Requests for an alternate format and other assistance should be directed to the FCOI/ECO.

Related Statutes, Policies, or Requirements

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 *31.05.01, Faculty Consulting and/or External Professional Employment*

System Regulation *31.05.02, External Employment*
University Rule *15.02.99.C1, Export Control Compliance Program*
University Rule *25.07.99.C1, Contract Administration*
University Rule *31.05.01.C1, Faculty Consulting, External Professional Employment, and Conflicts of Interest*
University Procedure *31.05.02.C0.01, External Employment*

Contact Office

Contact for interpretation and clarification:	Financial Conflict of Interest and Export Control Officer 361.825.5191