



The Texas A&M University System
The Texas A&M Engineering Extension Service

Agency Rules

Rule 15.05.04.N1 High Risk Global Engagements and High Risk International Collaborations

Approved January 21, 2023

Next Scheduled Review: January 21, 2028

Rule Summary

Texas A&M Engineering Extension Service (TEEX) encourages its employees to establish global engagements in the pursuit of mutually beneficial opportunities while noting the high risk of certain global engagements and international collaboration. This rule is required by System Regulation 15.05.04, *High Risk Global Engagements and High Risk International Collaborations*.

Definitions

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Rule

1 GENERAL

TEEX will fully comply with all applicable federal laws and regulations, along with System Regulations, concerning high risk global engagements and high risk international collaborations.

TEEX business activities or transactions will not be initiated or conducted with any Foreign Persons from Countries of Concern unless otherwise approved through the approval process detailed in System Regulation 15.05.04.

2 EMPOWERED OFFICIAL

The Deputy Director/Chief of Staff is the TEEX Empowered Official (EO), and serves as the TEEX designated official for high risk global engagements and high risk international collaborations.

3 INDIVIDUAL RESPONSIBILITIES

All TEEX 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 TEEX laws and regulations.

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4 RISK REVIEW AND APPROVAL

4.1 On a quarterly basis, the System Research Security Office (RSO) will provide TEEX with the list of Countries of Concern.

4.2 The review of high risk global engagements and high risk international collaborations will include the TEEX Export Control Officer (ECO) or TEEX Ethics and Compliance designee and the TEEX EO.

4.2.1 TEEX Form SES23, *Export Reviews and Assurances* must be completed for all high risk global engagements and high risk international collaborations.

4.2.2 The ECO 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), Texas A&M System, and any other relevant regulations.

4.2.3 Once the ECO or designee has reviewed the SES23, the high risk engagement or high risk collaboration will be forwarded to the System RSO for review pursuant to System Regulation 15.05.04. The System RSO will coordinate intra-System offices recommendations and approvals to include coordination with the System Office of General Counsel (OGC) and the Vice Chancellor for Research (VCR).

4.2.4 The System RSO will provide the VCR's final approval determination to the TEEX EO and the TEEX ECO regarding the high risk global engagement or high risk international collaboration.

4.3 Employees involved in high risk global engagements or high risk international collaborations are required to complete export control training every two years.

5 RECORD KEEPING

5.1 All export control decisions and screening results will be documented and copies retained by the ECO or TEEX Ethics and Compliance designees.

5.2 Records shall 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 TEEX SAP 61.99.01.N0.01, *Records Management*.

5.3 TEEX business units shall 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).



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Related Statutes, Policies, or Requirements

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

[TEEX Rule 15.02.99.N1, Export Controls Program Management](#)

[TEEX SAP 61.99.01.N0.01, Records Management](#)

[TEEX Form SES23, Export Reviews and Assurance](#)

[TEEX Export Control Program Manual](#)

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