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

Approved January 21, 2023
Revised August 24, 2026
Next Scheduled Review: August 24, 2031

Rule Summary

Texas A&M Engineering Extension Service (TEEX) encourages its employees to establish global engagements in the pursuit of mutually beneficial fundamental scientific inquiry, cultural, or educational opportunities. 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*.

Definitions

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Rule

1. **GENERAL**

1.1. General

1.1.1. TEEX is fully 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, TEEX, TEEX employees, and international collaborators.

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

1.1.3. 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*.

1.2. General Prohibition

1.2.1. Malign Foreign Talent Recruitment Programs — TEEX employees are prohibited from participating in Malign Foreign Talent Recruitment Programs. Any TEEX 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 TEEX Director of Ethics and Compliance courtesy copies of all Malign Foreign Talent Recruitment Program solicitations. The TEEX director of Ethics and Compliance must share those copies with the System Research Security Officer (RSO).

1.2.2. Confucius Institutes — TEEX is prohibited from maintaining contracts or agreements with a Confucius Institute.

1.2.3. TEEX employees are prohibited from accepting gifts or traveling to a Country of Concern for professional purposes. The TEEX Director of Ethics and Compliance must report to the System RSO any activities where employees are approached by groups representing a Country of Concern that offer gifts or travel.

1.2.4. TEEX employees are prohibited from entering 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.

1.2.5. Federal Funding Agency Research Security Inquiries — TEEX Director of Ethics and Compliance must notify the System RSO of any federal funding agency's request for research security related risk reviews.

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

3.1. 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.

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

4. RISK REVIEW AND APPROVAL

4.1. On a quarterly basis, the System 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 Director of Ethics and Compliance and the TEEX EO.

4.2.1. TEEX *Export Reviews and Assurances* Forms 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 the Bureau of Industry and Security (BIS), the Directorate of Defense Trade Controls (DDTC), the Office of Foreign Asset Control (OFAC), the System, and any other relevant regulations.

4.2.3. Once the ECO or designee has reviewed the submitted form, the high risk engagement or high risk collaboration will be forwarded to the TEEX director of Ethics and Compliance for knowledge.

4.2.4. The TEEX Director of Ethics and Compliance will communicate with the System RSO for review pursuant to System Regulation *15.05.04*. The System RSO will coordinate intra-System offices' recommendations and approvals, including coordination with the System Office of General Counsel and the Vice Chancellor for Research (VCR).

4.2.5. The System RSO will provide the VCR's final approval determination to the TEEX director of Ethics and Compliance and the TEEX ECO regarding the high-risk global engagement or high risk international collaboration.

4.3. All TEEX employees are required to provide notification of personal travel to a foreign adversary nation prior to travel and a post-travel brief to TEEX outlining details of the trip through Workday. The notification process will be monitored by TEEX Human Resources and detailed in TEEX SAP *31.01.N0.01*.

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 must 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 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).

6. TRAINING

Employees involved in high-risk global engagements and high-risk international collaborations are required to complete the "Export Control and Embargo Training (course number 2111212) via TrainTraq at least once every two years.

Related Statutes, Policies, or Requirements

System Regulation *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 Export Control Program Manual
TEEX SAP TEEX 21.05.01.N0.01 - Gifts, Donations, Grants and Endowments (gifts)
TEEX SAP 31.03.01.N0.01 - Vacation

Contact Office

TEEX Ethics and Compliance: (979) 500-6664

System Approvals*

Approved for Legal Sufficiency:

R. Brooks Moore
General Counsel

08/19/2026
Date

Approved:

Glenn Hegar
Chancellor

08/24/2026
Date

***System approvals are contingent upon incorporation of any and all System-required changes in the rule's final posting.**